

I-Martaw

Comments

Responses



martaw@sonic.net

10/22/2010 11:14 AM

Please respond to
martaw@sonic.net

To <wdrrmp@blm.gov>

cc

bcc

Subject Winnemucca Draft Resource Management Plan

Winnemucca Draft Resource Management Plan

I support Alternative C as well as the incorporation of the following recommendations in all Alternatives and analysis in the Final Environmental Impact Statement and Record of Decision.

BLM is purposely thwarting and ignoring the American public and violating the law. The actions of the BLM are despicable, cruel and inhumane. Stop it now and do the right thing.

- I-Martaw-1 > Include legal land descriptions for all Herd Areas and Herd Management Areas.
- I-Martaw-2 > Review all Herd Areas within the planning area for reintroduction to Herd Management Status as required by CFR 4700.3-1. Provide a detailed analysis and reasons for previous withdrawals as well as potential mitigation measures that may reinstate wild populations on legally designated Herd Areas.
- I-Martaw-3 > Identify wild horse and burro use areas as suitable for designation as wild horse and burro "ranges" to be devoted principally as sanctuaries for their protection and preservation as per Section 1333(a) of the Wild Free-Roaming Horse and Burro Act and 43 C.F.R 4710.3-2.
- I-Martaw-4 > Develop Alternatives that incorporate the designation of ACECs (Areas of Critical Environmental Concern) for all remaining wild burro herds and the critical habitat and resources if necessary to insure self-sustaining genetically viable populations within the planning area as per the FLMPA, Section 202 [43 U.S.C. 1712] (a)(3) for long-term sustainability.
- I-Martaw-5 > Identify Herd Areas, Herd Management Areas and Ranges that provide unique opportunities to develop public viewing opportunities and/or development of ecotourism based on the promotion of wild herds as well as including an analysis of potential economic benefits this would bring to local communities.
- I-Martaw-6 > Identify any bands or herds that use two or more Herd Management Areas to secure suitable year-long habitat and resources based on environmental conditions, migratory patterns or seasonal movement.
- I-Martaw-7 > Base wild horse and burro resource allocations on scientific and rational principles. Incorporate suitability criteria be established within the framework of the RMP as

I-Martaw-1: The Wild Horse and Burro Act did not specify legal descriptions in the designation of the HMAs and HAs. See Figure 2-6 Herd Areas and Figure 2-10 for location of HMAs.

Several GIS layers are available to the public for downloading at:
http://www.blm.gov/nv/st/en/prog/more_programs/geographic_sciences/gis/geospatial_data.html.

I-Martaw-2: Management of HMAs and HAs are provided at Actions WH&B- 1.3 and WH&B- 1.4.

I-Martaw-3: According to the Land Use Planning Handbookd-H1601 – BLM may consider designation of a WH&B Range when there is; significant public value present, unique characteristics in a herd or an outstanding opportunity for public viewing.

I-Martaw-4: A range of alternatives was considered by BLM in development of the PRMP. Three new ACECs are proposed for designation. See ACEC Nomination Report Appendix F – No public nominations were received applicable to WH&Bs.

I-Martaw-5: WH& B viewing areas have been added to the Watchable wildlife section.

I-Martaw-6: Comment noted.

I-Martaw-7: Establishing appropriate management levels based on monitoring and evaluations are implementation level decisions. Separate implementation planning and NEPA compliance would include public involvement.

	I-Martaw	Comments	Responses
I-Martaw-7 Cont-d	↑	recommended by the National Academy of Science over 30 years ago to better reflect actual use and available forage for free-roaming populations to achieve accurate appropriate management levels and “excess” determinations.	
I-Martaw-8		> Develop and incorporate within the framework of the RMP the methodology used to distinguish wild horse and burro impacts from livestock and other rangeland users. One potential method is to mandate monitoring and utilization levels be measured prior to the introduction of livestock in a given area order to distinguish class use and impacts.	I-Martaw-8: Determining impacts based on monitoring with respect to WH&Bs and livestock is provided a D-WHB-5.7.
I-Martaw-9		> In all Herd Management Areas, assure management plans will provide allocations and resources adequate to maintain a minimum of 150 animals at all times on the range per individual HMA as necessary to maintain long-term genetic viability according to the best available science. This will prevent inbreeding or population crashes as required by CFR 4700.0-6(a) and to ensure that populations are being managed as an integral part of the natural systems of the public lands.	I-Martaw-9: Comment noted.
I-Martaw 10		> In individual Herd Management Areas, prohibit management plans and strategies that fail to provide for self-sustaining wild horse and burro populations lower than a minimum population of 150 animals based on the concept of “genetic interchange” between bands or herds from different Herd Management Areas. The only exception to this could be if BLM can conclusively document known population interchanges by photographs or other identifiable markings of animals on a multiple and consistent long-term basis.	I-Martaw-10: Objective D – WH&B 1 provides for supporting healthy populations, achieving land health standards and a thriving natural ecological balance.
I-Martaw-11		> If necessary to provide habitat for wild horses or burros, to implement herd management actions, or to protect wild horses or burros from disease, harassment or injury, invoke BLMs authority to reduce or close areas of public lands to grazing use by all or a particular kind of livestock as established by C.F.R. 4710.5 (a), with the goal of maintaining self-sustaining genetically viable wild horse and burro populations through allocations assuring resources are adequate to maintain a minimum of 150 animals at all times on the range per individual HMA.	I-Martaw-11 : The Taylor Grazing Act authorizes the use of rangelands to livestock grazing, the Wild Horse & Burro Act established HMAs and provided protection for WH&B. The Federal Land Management and Policy Act (FLPMA) mandates that the BLM administered land be managed for multiple uses. Livestock grazing and WH&B are both uses authorized to occur on BLM administered land. The RMP analyzes several proposed levels of livestock grazing, up to and including elimination of livestock grazing.
I-Martaw-12		> Prohibit the use of “blanket” management options that allow for wild horse and burro reductions without supporting data to make excess determinations, i.e., “in the absence of species specific data, equitable reductions in livestock and wild horse and/or burros authorizations will be implemented.” The historical problem with the management approach of authorizing “equitable reductions” is there is no accountability or consequence to BLM if they fail to reduce the livestock portion of the projected reductions. Traditionally, BLM has removed wild horses and/or burros or reduced their population objectives while making no changes or increasing livestock authorizations shortly after applying changes exclusively to free-roaming populations.	I-Martaw-12: Establishing appropriate management levels based on monitoring and evaluations are implementation level decisions. Separate implementation planning and NEPA compliance would include public involvement.
I-Martaw-13		> Prohibit the issuance of non-renewable grazing permits in any wild horse and burro Herd Area, Herd Management Area or Range in order to allow maximum long-term rangeland health due to year long grazing pressure in these designated areas.	I-Martaw-13: This is reflected in FEIS. Refer to D-LG 1.11.
I-Martaw-14	↓	> Establish criteria within the RMP framework for incorporating periodic monitoring at	I-Martaw-14: BLM policy and technical references define methods for monitoring and meeting watershed, riparian, and aquatic health and functionality standards.

	I-Martaw	Comments	Responses
I-Martaw-14 Cont-d	↑	"key" times to establish data on available water. This should include mandatory flow rates, water quality data, status of historic sources (in order to collect trend data on water availability) and photographic evidence to establish credibility in BLMs data.	
I-Martaw-15		> Various related multiple use decisions issued by the Winnemucca Field Office as well as surrounding areas indicate the potential for significant and cumulative impacts to underground aquifers and water sources due to drawdown. Incorporate provisions within the RMP that provide mitigation measures for water loss, increase available habitat, disperse consolidated grazing pressures, and insure supplemental low cost water sources are available in times of drought or harsh environmental conditions for wild horses and burros as well as other wildlife species within the planning area.	I-Martaw-15: This action is an implementation level decision, not an RMP level decision. During the implementation level planning process a separate public involvement and NEPA analysis will be conducted.
I-Martaw-16		> Prohibit the use of any sterilization measures on populations that fall below the minimum genetic threshold of 150 animals or less and assure balanced gender structures to preserve natural herd behaviors and social dynamics.	I-Martaw-16: Comment noted.
I-Martaw-17		> Prohibit the inclusion of foals one year and under in population inventories and calculations occurring on the range for "excess" population determinations.	I-Martaw-17: Comment noted.
I-Martaw-18		> Establish population objectives and thresholds for big game species within the planning area to insure habitats support a "thriving natural ecological balance" between all species. The current policy to omit critical information on species populations, increased pressure on resource requirements and their resulting impacts fails to conform to federal law mandating scientifically sound management decisions and quality data to determine suitable habitat for all rangeland users. As public stewards, BLM needs to recognize and honor their position to preserve and protect all resources for the American people, both now and for future generations. State wildlife agencies have a vested interest in increasing big game populations to increase revenue. As such, studies, data, recommendations and management objectives may contain inherent "conflicts of interest" and biased towards the balanced management of resources on public lands.	I-Martaw-18: Management of big game species and populations are under the jurisdiction of the Nevada Department of Wildlife (NDOW) and is outside the scope of this analysis. See section 1.6 Planning Criteria and Legislative Constraints #3. The BLM works in cooperation with NDOW in the management of big game habitat. Under a multiple-use mandate, the BLM strives to achieve a balanced management of public land resources.
I-Martaw –19		> Provide for public review a detailed examination and analysis of all current multiple use applications within each Herd Area and Herd Management Area within the planning area. This is to include current livestock authorizations, the percentage each allotment overlaps existing wild horse and burro areas as well as maps clearly showing the relationship and resource allocations between livestock and wild equids within the planning area. The purpose of this information is to help the public be reasonably informed as to BLMs compliance with the Act's mandate to accomplish the protection of wild free-roaming horses and burros through their consideration as an integral part of the natural system of the public lands as well as their relationships with other uses of the public and adjacent private lands as outlined in CFR 4710.3.	I-Martaw-19: Establishing appropriate management levels based on monitoring and evaluations are implementation level decisions. Separate implementation planning and NEPA compliance would include public involvement.
I-Martaw-20	↓	> With respect to wildlife impacts to critical resources required by wild horse and burro populations, provide current estimated big game populations such as elk, pronghorn, mule deer and bighorn, populations affecting the wild horse and burro areas within the planning district, reasonably foreseeable future big game population objectives for these same areas	I-Martaw-20: See response I-Martaw-18.

I-Martaw	Comments	Responses
I-Martaw-20 Cont-d	that may impact management strategies to maintain self-sustaining genetically viable herds.	I-Martaw-21: See response I-Martaw-15. All Renewable Energy Plans of Developments subject to a federal action are required to be reviewed under NEPA.
I-Martaw-21	> All other multiple use authorizations within Herd Areas and Herd Management Areas such as current mining, oil and gas operations as well as renewable resource projects such as solar, wind or geothermal impacting or reasonably projected to impact habitat and/or resources in the Winnemucca Herd Areas and Herd Management Areas as well as projects or proposals that can be expected to be implemented in the reasonably foreseeable future. This should include a detailed map of each Herd Area and Herd Management Area in the planning area to allow the interested public to assess the impacts of other multiple uses to wild horse and burro habitat and populations in a site-specific manner.	BLM has furnished maps suitable for an RMP analysis. Several GIS layers are available to the public for downloading at: http://www.blm.gov/nv/st/en/prog/more_programs/geographic_sciences/gis/geospatial_data.html .
I-Martaw-22	> Include detailed analysis of the miles, kinds and locations of fencing within each HA/HMA within the planning district. Reaffirm strict limitations on fencing in wild horse and burro Herd Areas, Herd Management Areas or Ranges in order to preserve their free-roaming behaviors and to prevent entrapment, injury, death or undue degradation of resources due to limitations on seasonal or migratory movement.	I-Martaw-22: WH&B management with respect to fencing is addressed in WHB 2. Herd Management Areas are addressed when multiple use proposals occur within these areas in site specific NEPA analysis. These documents are made available to the public.
I-Martaw-23	> Incorporate protections for predators in and around herd management areas as a management tool for low cost population control and to support the “thriving natural ecological balance”.	I-Martaw-23: See response I-Martaw-18.
I-Martaw-24	> Prohibit management strategies that are based on “adoption criteria” as the primary consideration. This policy fails to conform to both the intent and the mandates of the Act. Incorporate management strategies that support historical herd traits and local community values for the bands/herds.	I-Martaw-24: Comment noted.
I-Martaw-25	> Utilize range management to address wild horses and burros who wander across the borders of Herd Management Areas (HMAs), instead of permanently removing them.	I-Martaw-25: Comment noted.
I-Martaw-26	> Removals of any kind should be rare and minimal. Other methods of management must be employed first and given a fair opportunity to succeed. If a limited removal is necessary, it must be done in a humane manner that respects horse social structure and keeps families intact.	I-Martaw-26: Comment noted.

I-Martin

Comments

Responses



comments@wdo.rmp
10/24/2010 08:23 PM

To wdrmp@blm.gov
cc
bcc
Subject Comments on RMP

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TodaysDate = (O: '10/25/10')
FirstName = (O: 'Louise')
LastName = (O: 'Martin')
Address = (O: '414 Manor Drive')
City = (O: 'Kennett Square')
ZipCode = (O: '19348')
State = (O: 'PA')
Telephone = (O: '')
email = (O: 'lfmroyal@aol.com')
MailingList = (O: 'Yes')
CommentCategory = (O: 'Wild Horses & Burros')
Comment = (O: 'As a taxpayer, I would like to know the justification for
spending all of these tax dollars to remove our wild mustangs and burros from
our land. You are destroying our legecy. After witnessing the methods by
which you do this, I can see the methods that are used are cruel and inhumane.
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I-Martin-1

What do we have to do to have you stop this totally inhumane practice? I would truly appreciate an answer.

Sincerely,

Louise Ferro Martin

')

I-Martin-1: Comment noted.

I-McGraw

Comments

Responses

~~John A. Garry McGraw~~ ~~jmcmcgraw@qcomcast.net~~

10/22/2010 07:58 AM

To <wfoweb@nv.blm.gov>

cc

Subject: Horses and burros

I-McGraw-1

Please develop a safe plan for this area (Winnemucca, Nev.) so that the wild horses and burros will not be disturbed and can live out their lives in peace. Thank you. SM

I-McGraw-1: Comment noted.

I-McMaster

Comments

Responses

LARRY McMASTER

RECEIVED BLM
WINNEMUCCA NV

2010 SEP 28 PM 2: 08

P.O. Box 862, Eureka, Nevada 89316

775 237-5602

Mr. Bob Edwards,
BLM
5100 E. Winnemucca Blvd.
Winnemucca, NV 89445

September 25, 2010

Mr. Bob Edwards:

I am writing in response to the Winnemucca RMP.

It is difficult for me and many others to imagine the BLM would propose more land from public use again. When is enough land taken from public use that will satisfy the government and their socialist greenies? We know that the answer is never but now is the time to end their greed.

As you can tell I am opposed to any new wilderness or even have bureaucrats spend the time to evaluate lands they think has wilderness potential, if there is such a thing. This is nothing but a ploy to put land out of reach of industry with mineral potential, geothermal and grazing as well as restricted use by the citizens of this country. Where is the common sense of government for this country to be self sufficient or is this to garnish heavy royalties to stimulate and support an ever bloating federal government? Again there is none but a political objective for socialists in the name of the environment.

What is the best use of these lands - grazing of domestic cattle. The unintended consequence would be the reduction of grassland fires since the cows would eat the fuel. This was successful in the past before the BLM lost its common sense. This policy is all politics and has been a stimulus for the firefighters to the detriment of the land and the taxpayers. Grazing would also create useful jobs.

Finally, your website does not work. How can industry establish websites that do not go down and the BLM cannot keep one up? Maybe this is why industry and ranchers are in a much better position to control this rich land rather than politicians and rogue government bureaucracies.

I oppose any new wilderness areas being established and the study of any additional lands to be selected for wilderness study and save the taxpayers moneys that is now only spent on stimulating the government payroll.

Another unintended consequence of proposing additional areas for wilderness is that someday in the near future, some bureaucrat or green organization will want to name one of these after our senior senator which would be add to his longer blight on this great state.

Sincerely,



I-McMaster-1: Comments noted.

I-McMaster-1

I-Melby

Comments**Responses**

October 25, 2010

Bureau of Land Management
Winnemucca District
5100 E. Winnemucca Blvd.
Winnemucca, NV 89445
Attn: RMP Team

RE: Comments regarding the Winnemucca District Office Draft
Resource Management Plan and Environmental Impact Statement

Dear RMP Team:

Please accept my comments on behalf of myself and my hunting partners, many of whom visit and recreate within the Winnemucca District.

I-Melby –1

In general, I do not support Alternatives A, C1, and C2. Alternative A is based on outdated planning documents that do not sufficiently address current public land management challenges. Alternatives C1 and C2 are much too restrictive to adequately address major resource challenges, particularly in regards to fire and invasive weed species, and is not within the multiple use mandates. There are many portions of Alternative B that I support, but in general Alternative D appears to be the best overall option in my view. The comments below are more specific to what I would and would not support within the various alternative approaches.

Water Resources:

I-Melby –2

I support Action D-WR 1.3; however, all standards, BMPs, etc should be developed or amended to be site specific in order to maximize effectiveness.

I-Melby –3

I adamantly oppose Action B-WR 2.1. Water distribution shall comply with State water law. Water importation and exportation shall stay with the defined ground water basin.

I-Melby –4

I am not generally supportive of water export or import projects. In terms of Action D-WR 2.1, the project proponent for any export or import should be required to monitor for resource damage to public lands and should be required to mitigate any negative impacts.

I-Melby-5

I am very supportive of Action D-WR 2.2. These projects should be developed in cooperation and coordination with authorized public land users and interests such as grazing permittees, and the Nevada Department of Wildlife in order to maximize locations for multiple benefits.

Vegetation – Woodland/Forest Products:

I-Melby –6

I support Action D-VF 1.1 and D-VF 1.3, but am very skeptical about the use of fire in Action D-VF 1.2. I would suggest the inclusion of language that requires only cool-season burns when chance of fire spread is absolutely minimized.

I-Melby-1: D-WR 2.1 references mitigation measures which, as with other economic ventures, would be provided by the proponent. Each case will be evaluated to determine the appropriate mitigation which could include resource damage monitoring.

I-Melby-2: Land health standards are generally broadly applied; however, BMPs and mitigation measures are project specific to help meet those land health standards.

I-Melby-3: The BLM adheres to United States Code: Title 43 USC 666, also known as the McCarran amendment, which requires that federal entities waive sovereign immunity and comply with state water law. If water law conflicts with management objectives and actions, the BLM will defer to state law and seek to use the most effective alternative means to manage the health of the land and its multiple uses.

I-Melby-4: See response I-Melby-1 and 2.

I-Melby-5: Comment noted.

I-Melby-6: BLM has developed a range of alternatives. Refer to Action VWM 2.1. For most prescribed fire planning BLM adheres to cool-season burns. However, there may be situations where burning in warm season is necessary especially for research studies or in upper elevations. Limitations based on season may not allow for meeting management objectives.

	I-Melby	Comments	Responses
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I-Melby -7		I support Objectives D-VF 2 and D-VF 3 assuming that "Maintenance" of woodlands means active maintenance and not passive maintenance. I am very supportive of Action D-VF 3.4, particularly to restore and protect critical sagebrush habitat for deer and sage-grouse.	I-Melby-7: Comment noted.
I-Melby -8		In regard to Actions D-VF 4.1 and 4.2, the designation of old growth forest should be based largely on soil surveys and ecological site descriptions rather than a subjective process. Vegetation – Weeds:	I-Melby-8: According to the Healthy Forests Restoration Act of 2003-Section 102(e)(1)(D) which states in part; "Old Growth Stands is "based on structure and composition characteristic of the forest type"... BLM policy per "The Healthy Forest Initiative and Healthy Forest Restoration Act – Interim Field Guide" further clarifies "the HFRA does not mandate particular definitions of "Old Growth" or specific process to identify old-growth stands." BLM utilized existing structure and composition of the forest type to delineate old growth stands.
I-Melby -9		I strongly support the stated Goal, Objective D-VW 1 and Action D-VW.1.1 to utilize an integrated approach to weed management and promotion of ecosystem resilience. I am adamantly opposed to Action C-VW.1.1 that does not allow for use of chemical treatments. Recent scientific findings suggest that chemical treatments can be extremely effective at promoting ecosystem resilience. The District must utilize ALL available means to prevent and minimize the spread of invasive vegetation.	I-Melby-9: BLM identified a range of alternatives with respect to weed management. Alternatives A, B, and D all include chemical treatments.
I-Melby -10		I strongly support Action D-VW.1.2.2. I believe in collaborative processes to address major resource challenges. That being said, NGOs and Partnership Programs should be included in the list of entities to include in such processes. In particular, I support utilizing the strengths of groups like the Wildlife Conservation Group, the Nevada Partners for Conservation and Development and various sportsmen and wildlife conservation groups such as the Northern Nevada Chapter of Safari Club International, Nevada Muleys, Nevada Chukar Foundation, etc.	I-Melby-10: The BLM complies with FLPMA and other applicable laws and regulations by employing principles of coordination, cooperation, consultation, and collaboration to enhance communication, obtain advice or opinion, encourage participation, and inform and engage diverse interested parties for the purpose of seeking solutions for managing public lands.
I-Melby-11		I strongly support the inclusion of Objective D-VW.2 and Action D-VW.2.1. Invasion of undesirable annual grasses is one of the biggest threats to wildlife habitat and ecological resilience, and all tools should be made available to deal with this problem. I am highly supportive of use of chemical treatments, prescriptive grazing, use of adaptive species, etc. to combat invasive undesirable annual vegetation. Vegetation – Rangeland:	I-Melby-11: Comment noted.
I-Melby -12		I am generally supportive of the stated Goal; however, resilience of vegetative communities should be stated in the goal. The threat of fire and weeds within the district demands resilient ecosystems.	I-Melby-12: Resilience of vegetative communities is stated in Objective VR 1.
I-Melby -13		I am very supportive of Objective D-VR 1, Action D-VR 1.1 and 1.2. However, I am very concerned about the emphasis on use of prescribed and wild fire. I would prefer the use of other vegetation manipulations such as mechanical and chemical over the use of fire, which is much more risky.	I-Melby-13: BLM has developed a range of alternatives. See Action WFM 2.1.
I-Melby -14		I suggest the addition of a new Action D-VR 1.3 that would emphasize cooperation between the BLM and State agencies such as NDOW and NDF, conservation and wildlife NGOs, and partnerships to pool limited resources in order to maximize active management projects. Other western states, such as Utah, have been able to greatly increase restoration projects through such partnerships.	I-Melby-14: The BLM has an extensive list of Cooperating Agencies and partners to accomplish public land management goals and objectives. The BLM complies with FLPMA and other applicable laws and regulations by employing principles of coordination, cooperation, consultation, and collaboration to enhance communication, obtain advice or opinion, encourage participation, and inform and engage diverse interested parties for the purpose of seeking solutions for managing public lands.


I-Melby	Comments	Responses
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I-Melby-15	I am very supportive of Action D-VR 1.2.1 to utilize livestock in order to reduce fuels loads created by annual invasive species, provided it does not conflict with wildlife objectives. I would encourage the use of this approach to protect desirable habitat areas that are surrounded and threatened by fire from adjacent areas dominated by invasive vegetation.	I-Melby-15: Comment noted.
I-Melby-16	I have concern in regards to Action D-VR 1.3. While I support re-establishment of native vegetation, it is almost always difficult to do in the face of invasive weed species. Therefore, seed mixes should be determined on a case-by-case basis, and introduced species, proven to be competitive with invasive weeds, emphasized in areas where there is a high probability of establishment of undesirable/invasive weeds. I would also recommend the use of soil bio-assays to determine the condition of the existing seed bank when developing a seed mix. I also suggest that the BLM cooperate with the Agricultural Research Service, and/or utilize the best science, in order to identify and use the most desirable introduced species to prevent establishment of invasive species until native plants can become established.	I-Melby-16: According to BLM Emergency Stabilization and Rehabilitation Handbook, BLM policy is to determine seed mixes on a case-by-case bases. See also BLM Manual 1745 Introduction, Transplant, Augmentation, and Reestablishment of Fish, Wildlife, and Plants; and Executive Orders 11987 and 13112. Action D-VR1.3 prioritizes utilizing native seeds first, followed by non-natives. See also Action VR 4.1. Additionally, the BLM has an extensive list of Cooperating Agencies and partners to accomplish public land management goals and objectives.
I-Melby-17	I am generally supportive of Objective D-VR 3. However, an action item should be added to emphasize the need for seeding burned areas as soon as possible following wildfires. Restoration priorities should also be stated, for example, restoration in Priority 1 wildlife habitat should be emphasized as well as restoration in areas at higher risk for establishment of invasive weeds.	I-Melby-17: See C and D VR 4.1. BLM emergency stabilization policy requires seeding to be completed within 1 year from the date the fire is contained. Restoration priorities are also defined by BLM policy. The Winnemucca District strives to seed in the fall following the fire, usually within a few months depending on the date the fire is contained.
I-Melby-18	I am very supportive of Action D-VR 4.2; however, the first priority should be maintaining healthy habitats, then restoration of burned habitat, and finally treatment of monocultures. Once again, I would encourage the use of the best available science and working with a suite of partners to accomplish this action.	I-Melby-18: BLM works with other partners in developing Emergency Stabilization and Rehabilitation Plans.
I-Melby-19	I am fully supportive of Objective D-VR 5 and associated actions. I am fully supportive of Objectives D-VR 6 and 7 as well as associated actions; however, I suggest that this Objective be given a higher priority. In my view, this should be a higher priority than restoring cheat grass monocultures.	I-Melby-19: Maintain (6) and restore (7) sagebrush communities, these actions are not listed from high to low, there is no priority.
I-Melby-20	<i>Fish and Wildlife:</i> I am in full support of the described fish and wildlife goal, Objective D-FW 1, and associated actions. However, in addition to the areas listed under Action D-FW 1.1, I would urge the inclusion of the Pine Forest Range, and Granite Range including all areas north to and including Fox Mountain as Priority 1 Wildlife Habitat. These areas include highly productive wildlife habitat, especially for key game species such as mule deer, pronghorn antelope, bighorn sheep and sage-grouse. These areas are also highly popular with sportsmen and non-consumptive recreational users. I am in full support of excluding new rights-of-way within Priority 1 areas, particularly in regards to renewable energy development. I do not oppose responsible energy development, but these areas are not suitable to such activities based on the rich wildlife diversity and popularity for recreational pursuits.	I-Melby-20: Granite Range is already proposed for exclusion area under Alternative C and D 5.4. Priority Habitat map has been revised in the FEIS. In addition, the area extending from the Granite Range to Fox Mountain is included as the proposed Priority 1 habitat. The proposed Pine Forest ACEC includes large acreages and addresses wildlife needs. An area south of the ACEC, that is important sage grouse habitat, has been reconsidered for designation as Priority wildlife habitat areas in the FEIS.
I-Melby-21		I-Melby-21: Comment noted.

I-Melby	Comments	Responses
Bureau of Land Management October 25, 2010 Page 4	<p>I adamantly oppose Action B-FW1.1.</p> <p>I am in full support of Objectives D-FW 2, - 11 and all associated actions.</p> <p>I am highly supportive of Action D-FW6.1, the development of wildlife water guzzlers to expand or mitigate wildlife population areas.</p> <p>I am highly supportive of Actions D-FW 2.1 and 2.2, assuming this includes both the Statewide Wildlife Action Plan and Sage-grouse Conservation Plan. Another action should be added to encourage partnerships with NDOW, conservation and sportsmen groups to implement actions and projects identified within HMPs.</p> <p>I also support, A-FW6.1, to construct and fence wildlife water developments to provide additional year long sources of water for the exclusive use of wildlife.</p> <p>Special Status Species:</p> <p>I strongly support Action D-SSS1.2, Sage Grouse.</p> <p>Wild Horses and Burros:</p> <p>I strongly support the reduction of the horse AML, Appropriate Management Level, of the population numbers of the wild horses within the Priority 1 and 2 wildlife habit designations. This concept promotes and encourages wildlife and minimizes wild life competition.</p> <p>I strongly object to Alternative "C" Action Items, where no fertility control is utilized.</p> <p>I support the management goal for WHB presented in Table 2-1 as well as the objectives of the Preferred Alternate D presented in Table 2-3. I have the following suggestions for additional management actions:</p>	I-Melby-22 : BLM has developed a range of alternatives.
I-Melby –22	<ul style="list-style-type: none"> • BLM has not been able to conduct accurate census nor has been able to accurately conduct population models. An example of this fact is the Jackson Mountains where actual populations exceeded the projected population by 300 percent. An emergency gather was necessary resulting in the death of many animals due to poor condition. It is not known how much wildlife died due to over-utilized forage and competition at water sources. Direct counts by aerial census or inadequate correction factors have improperly been utilized in population estimates in the past resulting in more horses on the ground than projected. I therefore suggest the following management action: <i>"Regular aerial census shall be conducted on a maximum three-year interval utilizing the latest approved scientific methods. Census shall be conducted concurrently across the boundaries of HMA's, BLM districts, USFS, and USFWS lands. Appropriate correction factors shall be applied to all field census figures utilized in population models."</i> 	I-Melby-23: Suggested actions are in place through the Tri-State WHB Memorandum of Understanding.
I-Melby –23	<ul style="list-style-type: none"> • AMLs are often out of date providing grounds for protest and litigation. Range conditions and, therefore, carrying capacity for all species change with drought and wildfire. When range conditions are degraded, domestic livestock usage is decreased and wildlife 	I-Melby-24: Specific allotment AUM allocation decisions are addressed at the site specific or allotment level.

I-Melby	Comments	Responses
Bureau of Land Management October 25, 2010 Page 5		
I-Melby –24 Cont-d	↑ populations adjust themselves downward (since the 1960's there is now half the domestic livestock AUMs and mule deer populations are on the steady decline, while wild horse populations have spiraled upward). I suggest the following management action: <i>"AML shall be reviewed and revised as necessary every 10 years, or following major wildfires, or five (5) years of drought."</i>	
I-Melby-25	<ul style="list-style-type: none"> The 2010 gather in the Calico Complex did not remove the number of excess horses planned in the EA. Horses simply migrate in and out of HMAs and HMA complexes. The post-gather census counted horse numbers 200 percent above the objective. I therefore suggest the following management action: <i>"Gather objectives shall be met even if crossing HMA boundaries are necessary."</i> 	I-Melby-25: Comment noted.
I-Melby –26	<ul style="list-style-type: none"> I fully support "self sustaining" wild horse and burro populations on our public land, but the definition needs to be clearly stated in this document. To achieve self-sustaining populations, the low range of AML must first be achieved, followed by intensive management techniques of fertility control, sex ratio manipulation, and creation of non-reproducing herds. I suggest the following management action: <i>"A sufficient number of large HMAs shall be analyzed and be converted to non-reproducing herds so that natural attrition in these HMAs could be supplemented from necessary gathers of excess animals in smaller HMAs and, along with adoption demand, result in a <u>static population</u> statewide – a true sustainable herd condition."</i> This management action would almost eliminate required gathers in the treated large HMAs, greatly reduce the need for future long-term holding and sanctuaries, reduce transportation and short-term holding needs, and tremendously reduce the program budget. 	I-Melby-26: Comment noted.
I-Melby-27	<p>Wildland Fire Ecology Management:</p> <p>Fire suppression, pre-suppression and fuels management issues are described in several portions of this document. These points are not reiterated in this section.</p> <p>As is referenced in the Executive Summary, fire suppression costs are increasing. The best method to reduce fire suppression costs is to keep fires small by managing incident response, potential fire environment and fuels.</p> <p>I strongly support efforts in federal/state/local government/private initiatives in fire suppression and pre-suppression efforts. Continued support of these efforts and the components (training, red carding, equipping) should be referenced in the alternatives.</p>	I-Melby-27 : Objectives and Management Actions Common to All Alternatives – Wildland Fire Ecology Management includes: CA-WFM1 & CAWFM 1.1-1.5 which addresses suppression management priorities. Objective CA-WFM 3 and Management Actions CA-WFM 3.1-3.3 addresses management of fuels. Fuels Management is also addressed in section WFM 2.
I-Melby-28	<p>It is difficult to address which alternative/objective to support as there is a significant need for more information and variation in alternatives. In several alternatives and objectives there is considerable reference to the reduction of man-caused fire risk as access is limited. As the fire risk from lightning is far greater than man caused risk, research into how reducing access may result in delays in suppression activities on lightning caused fires is necessary. The benefits of utilizing access roads as fuel breaks for various suppression activities in a continuous fuel bed must also be addressed.</p>	I-Melby-28 : Winnemucca District fire history shows about half of all fires are human caused. The Winnemucca District has a long history of utilizing roads as fuelbreaks or to enhance fuelbreaks. Appendix B-BMPs and SOPs has been revised to reflect: Where practical construct fuelbreaks/greenstrips in areas previously disturbed such as along roadways and in previous burned areas.

I-Melby	Comments	Responses
Bureau of Land Management October 25, 2010 Page 6		
I-Melby-29	Livestock grazing alternatives do not specifically address fire fuels management, unless that is in the grazing standards referenced. Areas selected for restricted grazing or closed to grazing should include an exemption if grazing for fire fuels management is indicated	I-Melby-29: See VR 1.2 There are a range of land and vegetation treatments available to protect, maintain, or improve vegetation that are available, including livestock grazing if appropriate. Action WFM 2.1 has been modified to include prescribed grazing for alternatives A,B, and D.
	<p>Recreation, Visitor Outreach and Services:</p> <p>I strongly support Action Item D-R2.1.1 and D-R3; providing the public and the youth with a better understanding of our area's natural resources is important.</p> <p>General Note: I would like to be notified and involved with the Transportation Plan and its updates.</p>	
	Renewable Energy:	
I-Melby-30	I support the Renewable Energy Goal and Objective D-RE 1; however, would strongly recommend the addition of language that requires the BLM and renewable energy project proponents to consult with local stakeholders and the County to identify and address any concerns prior to submittal of a plan of development.	I-Melby-30: All Renewable Energy Plans of Developments are required to be reviewed under NEPA. This process is a public process. Local governments may be invited to be Cooperating Agencies in the NEPA process.
I-Melby-31	I strongly support the concept of avoidance and exclusion areas as described in Actions D-RE 1.2 and 3. However, I would urge the inclusion of the Pine Forest Range, and Granite Range including all areas north to and including Fox Mountain as exclusion areas rather than avoidance areas. These areas include highly productive wildlife habitat, especially for key game species such as mule deer, pronghorn antelope, bighorn sheep and sage-grouse. These areas are also highly popular with sportsmen and non-consumptive recreational users.	I-Melby-31: Granite Range is already proposed for exclusion area under Alternative C and D 5.4. Refer to Figure 2-62. The Fox Range and Pine Forest Range are WSAs which, in accordance with the Interim Management Policy, are excluded from right-of-ways and discretionary actions. The proposed Pine Forest ACEC includes large acreages and addresses wildlife needs. An area south of the ACEC, that is important sage grouse habitat, has been reconsidered for designation as Priority Wildlife Habitat in the FEIS.
	Transportation and Travel Management:	
I-Melby-32	<p>The final document needs to include a specific definition of "Limited Access" rather than a reference to another document or policy. Should that definition change, the parameters of this entire section would change.</p> <p>I am supportive of the stated Transportation and Travel Management Goal.</p>	
I-Melby-33	<p>I am generally supportive of Objective D-TA 1 and associated actions. I do have a concern with action D-TA 1.4. This action should be taken only after consultation with NDOW to ensure that seasonal or temporary closures do not limit access to public lands during hunting seasons.</p> <p>I am very supportive of Objective D-TA 2 and Action D-TA 2.1.</p>	<p>I-Jefferson-32: See Action D-R 10.1 for the BLM definition of "Limited".</p> <p>I-Melby-33: A Comprehensive Transportation & Travel Management Plan (CTTMP) will address these concerns after the Record of Decision for the RMP is signed. The CTTMP will be determined with full public participation and input.</p>
I-Melby-34	I am extremely concerned with Objective D-TA 4 and associated actions. I am not opposed to the principal of these items, but I will not support the closure or re-routing of any existing roads without extensive public participation and input. My understanding was that these actions would be identified through a Transportation Planning Process that would include extensive public involvement. If that is in fact the case, it should be clearly indicated within Objective D-TA4.	I-Melby-34: Comment noted.

	Comments	Responses
	<p>I-Melby</p> <p>Bureau of Land Management October 25, 2010 Page 7</p> <p><i>Lands and Realty:</i></p> <p><i>Areas of Critical Environmental Concern:</i></p> <p>I am not opposed to the proposed ACECs in general. However, in terms of the Pine Forest ACEC, I urge the incorporation of the boundary adjustments and management stipulations developed by the local Pine Forest/Alder Creek WSA Working Group as adopted by the Humboldt County Commission.</p> <p><i>Wilderness Study Areas and Lands with Wilderness Characteristics:</i></p> <p>I am fully supportive of the Wilderness Characteristic Designations in Pershing County ASSUMING that these areas accurately reflect the input of the local working group that was formed during the County Lands Bill Process.</p> <p>I am fully supportive of designating the Granite Range and Fox/Buckhorn Mountain as Priority 1 wildlife habitat. I am of the opinion that this is adequate protection for these areas, and therefore do NOT support the classification of these areas as wilderness or identified as areas with wilderness characteristics. There are too many restrictions that come with potential wilderness designations given the potential need for proactive habitat management, fire suppression, pre-suppression and restoration in these areas. Also, assuming that a travel management plan is developed for these areas, there is not a concern with cross-country travel. Wilderness designations have the potential to greatly reduce access to highly desired recreation areas, and seems to be in conflict with the Special Recreational Area Designation. For these reasons, I do not support identifying these areas under the Wilderness Characteristic Designation.</p> <p><i>Summary:</i></p> <p>I support the idea of preserving the rights of the sportsmen and promoting wildlife conservation.</p> <p>I would like to promote the idea of team and working together to accomplish and support those ideas.</p> <p>I would like to be involved and participate in the BLM process now and in the future.</p> <p>The following will highlight a few of my thoughts:</p> <p>Water Resources should be preserved to support the wildlife it serves and stay within the boundaries or basin they serve.</p> <p>Promotion of the wildlife habit and the management of that habit are extremely important. Restriction to that management and the tools they use should not be restricted, particularly with fire fighting.</p> <p>The encouragement of habitat development is extremely important to the promotion and the health of the wildlife population.</p>	
I-Melby-35		I-Melby-35: Comment Noted
I-Melby-36		I-Melby-36: These are the areas designated by the working group.
I-Melby-37		I-Melby-37: Comment Noted
I-Melby-38		I-Melby-38: Objective D-WR 2 includes providing water for wildlife on public lands. The BLM does not anticipate transporting water for wild-life purposes.
I-Melby-39		I-Melby-39: Fire fighting tactics are implementation level decisions and are made on a case-by-case basis.
I-Melby-40		I-Melby-40: Comment noted

I-Melby	Comments	Responses
Bureau of Land Management October 25, 2010 Page 8		
I-Melby-41	The establishment of the priority habitat appears to be a great concept. We would like to see areas defined to promote wildlife. With the development of these areas, we would also not like to see the sportsman access be reduced or diminished.	I-Melby-41 : Comment noted.
I-Melby-42	The idea of ALM reductions in the priority wildlife management areas would greatly enhance and benefit the quality of wildlife.	I-Melby-42 : Comment noted.
I-Melby-43	Fire protection and fire fighting capabilities should become a high priority as the priority habitats are defined and action plans should be in place. The idea of promoting a private/public partnership for fire fighting should be in the plan policy.	I-Melby-43 : Comment noted.
I-Melby-44	The idea of protecting defined wildlife priority areas against commercial development, whether it is renewable energy or mining is also essential to the promotion of wildlife	I-Melby-44: Comment noted.
I-Melby-45	The concept of public education regarding habitat and wildlife issues is critical. The general public and the kids need to be educated regarding the rangeland, feed, water and sustainability issues associated with our outdoors.	I-Melby-45: Providing public education and outreach are addressed under Recreation Objectives R 2 and R 3.
Sincerely,		
Terrence J. Melby, Sportsman Reno, Nevada		

I-Moore

Comments

Responses



PQinginger@aol.com

10/21/2010 04:11 PM

To wdrmp@blm.gov

cc

bcc

Subject Winnemucca RMP, Edwards

1-Moore-1

I find it appalling and completely reprehensible on the part of all agencies that this proposal does not adequately protect and preserve wild horses and burros, or alter the BLM's reliance on inhumane and fiscally irresponsible wild horse roundups and removals.
They keyword is adequately. Add humanely and compassionatly.

Past gatherings and round-ups sanctioned or conducted by the BLM *drove to their deaths and maimed many of our Country's Wild Horses.*

This "Plan" calls for the extermination of a National Treasure - by ignorant self-serving bureacacies.

You should be ashamed.

I am writing my Congressmen about the BLM and your "Plan," telling EVERYONE I know to do the same and to boycott NEVADA.

Signed,

A disgusted United States TAXPAYER.

P. M. Moore

1-Moore-1: Comment noted.

I-Morgan

Comments

Responses



Georgia Morgan
<georgiam2@hughes.net>
10/24/2010 09:05 AM

To: wdmp@blm.gov
Cc: georgiam2@hughes.net
Bcc:
Subject: "Winnemucca RMP, Edwards"

Georgia Morgan

21720 Pyramid Lake Road

Lovelock, NV 89419

775-538-7010

georgiam2@hughes.net

October 24, 2010

Bob Edwards

BLM Winnemucca District Office

5100 E Winnemucca Blvd

Winnemucca, NV 89419

RE: Draft Resource Management Plan

Dear Mr. Edwards,

First I want to extend my appreciation to your office for the work completed to assist in creating the draft RMP. I know it is time consuming and not to overlook the obvious that dealing with the public can be tedious at times. I live within the Humboldt River Ranch Association subdivision and want to voice my opinion as part of that "public".

	Comments	Responses
	<p>I-Morgan</p> <p>I am in support of Action D-LG 1.3. I have had the opportunity for the past 12 years of living here to experience the changes that have taken place, particularly with the cattle grazing issue. With the addition of new residents within the subdivision the safety of the people living here is a great concern. The cattle tend to gather on the roadways and at times you don't see them until they are almost on your hood.</p>	
I-Morgan-1	<p>I can understand that 20 or so years ago the cattle grazing was not an issue but unfortunately the situation has changed and will continue to change with additional housing. Currently housing is scattered throughout the subdivision and the cattle of course are gathering and will continue to gather where there are possible water sources.</p> <p>The way I understand Action D-LG 1.3 is that the current permit holder will not lose any AUMs but that they will be moved to a different location, away from the Subdivision. I can understand why the permit holder does not want to have to move because he has had over 9,000 acres of free grazing on privately owned properties within the subdivision to the detriment of the residents. BLM must have realized that in 1998 when the lease of the private lands within the Rye Patch Allotment expired and BLM reduced the number of animals allowed through that permit.</p> <p>I keep hearing the ranchers who are in support of the permit holder state that it is their right to graze which is not correct, it is a privilege. I also continuously hear about the permit holder having water rights and therefore they have unlimited access through the private properties within the subdivision. There is so much controversy regarding the entire subject and I am sure it will just keep growing.</p>	<p>I-Morgan-1: The RMP analyzes several alternatives for grazing in the Rye Patch area, to include closure of all or a portion of the public land near the Humboldt River Ranch Estates to grazing, to leaving the public land area open to grazing.</p>
I-Morgan-1	<p>The bottom line is that the area has grown and will grow. As with any growth changes must be made to adapt to that growth. You don't see cattle's grazing in the cities of Winnemucca or Lovelock, yet in the past grazing was allowed on the land where those cities now exist.</p> <p>The permit holder makes no attempt to try to keep his cattle on his allotted areas. His animals have died on private properties within the Association and the permit holder takes days and sometimes over a week to remove the carcass. He has unloaded the cattle from the semi trucks on the Association's privately owned roadways, crossed properties owned by individual Association members to drop off hay on small portions of land between the subdivision and the</p>	

I-Morgan

Comments**Responses**

interstate during the winter months causing damage to the v-ditches that carry the drainage through the subdivision. These are things he could have done differently but instead chose to impact the residents of this community.

Pershing County Commissioners stated they wanted to stay neutral on the grazing issue and withdrew a letter of support they once had submitted to BLM on the Association's behalf to create a cattle free area within the subdivision. Now that Pershing County appointed a Committee that has created their own Pershing County Natural Resource Management Plan the Commissioners have chosen to send a letter of support for that plan and will be sending BLM a letter that does not state a neutral standing. I truly hope that when BLM receives the letter, that they review the history of "support" the Pershing County Commissioners have submitted and disregard the give and take they so willingly provide.

As a person who is a resident of the area who will be greatly affected by the decision that will be made regarding the issue at hand, I am in support of protecting my community and respectfully request that BLM adopt Action D-LG 1.3 as noted in the Draft RMP/EIS.

Thank you for your time and consideration regarding this matter.

Sincerely,

Georgia Morgan

I-Munn

Comments

Responses



"Leon Munn Jr"
<mags8@hughes.net>
09/02/2010 02:48 PM

To: <wdmnp@blm.gov>
cc:
bcc:
Subject: Winnemucca District RMP ATTN: Bob Edwards

Reference:

Livestock Grazing

I don't wish to pay higher assessments in order to repair roadways damaged by the cattle (livestock), as I already am paying the HERRA an annual fee to support the upkeep of the roads.

I also have no problem with the Cattle Grazing in my area, as I have my property fenced in.

I am retired and on a fix income and can not afford the higher assessments.

Leon Munn Jr
21790 Old Victory Hwy
Lovelock, NV

775-538-7366

I-Munn-1:
Comments noted.

I-Munn-1

I-Nappe

Comments

Responses



Leonine Nappe
 <nappe@nrvball.net>
 10/25/2010 01:20 PM

To: wdrmp@blm.gov
 cc:
 bcc:
 Subject: Bob Edwards - RMP Comments

October 25, 2010

Bob Edwards,
 BLM Winnemucca District Office
 Winnemucca Nevada

Draft RMP/Draft EIS Comments:

First my compliments on the Draft RMP/Draft EIS for the breadth of studies and information, the time spent with a variety of agencies and organizations to develop the plan and proposed actions. Unfortunately, Nevada and its local governments lack the resources, the breadth of responsibilities, and the dedicated staff to produce a document of this complexity and resource documentation.

Unfortunately, I have not reviewed the information in detail nor been part of any review committee. Therefore my comments may be addressed somewhere in the extensive document. For this I apologize.

I was a member of the Winnemucca RAC when the 1980 plan was developed. There have been major changes in public land use. There are new interest groups and uses of public land resources. While the document notes the change of population status within the district boundaries, changes beyond those boundaries in Nevada and the nation affect uses and resources to address those uses on public lands.

For starters, the population of Nevada has surged during those intervening years expanding from 800,500 in 1980 to 2,640,000 in 2007. Nevada has been highlighted with the annual Burning Man festival (about 45,000 people) and passage of Black Rock Desert-High Rock Canyon Emigrant Trails National Conservation Area Act of 2000, which highlights both protection and an invitation to explore. The Nevada Commission on Tourism has promoted public land exploration with a promotion program "The Dirt" encouraging off road use.

Nevada continues to be a primary and relatively cheap corridor to carry energy to the California markets. These corridors, along with renewable energy opportunities in geothermal, wind, and solar, will result in staffing burdens and also fragmentation and loss of habitat. Nevada is promoting renewable energy as a means to rebuild its employment tax base; some Nevada leaders are seeking ways to bypass BLM's responsibility for multiple use and public review.

There are structural changes in the soil/vegetative foundation as a result of over 100 years of heavy grazing on Nevada's vulnerable desert adapted plants, especially its once expansive bunch grasses. Bulldozed lands for roads, utility corridors, and dispersed recreation also contributed to this change. We are losing ground in maintaining our native plants to the now infamous Asian/Mediterranean weed infestations. Programs to combat these weeds now have a prominent place in BLM's management plan. Unfortunately, the money, mostly federal, to combat these infestations is insufficient to stop their spread.

Nevada has become prone to fire; a monoculture of weeds is no longer uncommon; restoration and revegetation are becoming the norm. Funding for weed removal and range restoration is not reliable and

	I-Nappe Comments	Responses
	always insufficient.	
I-Nappe –1	Climate change is touched upon utilizing Chambers (2008) report showing that there are now higher minimum temperatures, less snowpack, and therefore less stream flow. It was not clear how this will be addressed. Will there be more water developments for hoofed animals like cattle, horses, and pronghorn antelope? How do water developments help riparian dependent birds, for instance, who need the riparian plants for feeding and nesting? Will cattle and horses use of public lands be reduced; will more fencing of riparian areas occur? Who will pay the cost? Will BLM be capable of regularly monitoring grazing by horses and livestock? Without monitoring how will adaptive management be implemented.	I-Nappe-1: The BLM has conducted additional analysis for climate change in the FEIS. This analysis includes greenhouse gases, major economic sectors contributing to emissions that are subject to BLM land use management practices, global mean temperature changes, and future trends.
I-Nappe –2	The plan identifies the microbiotic crusts which have been important stabilizers of plant diversity and survival. Where these crusts remain, is it possible to limit recreation, livestock, and horse use to protect these lands? Can ACEC's or natural resources be created where biotic crusts and historical vegetative systems still remain? Neither the Black Rock NCA nor the Sheldon National Wildlife Refuge at this point are identifying and native plant ecosystems with their wildlife diversity as special places.	I-Nappe-2: These types of protections are beyond the scope of this RMP and could be considered in future site specific actions.
I-Nappe –3	<p>Ranchers and their dependence on public land livestock grazing was a powerful institutionalized system in 1980. Since 1980, the number of public land AUMs in Nevada has reportedly dropped from 1,489,464 AUMs to 963,417 AUMs in 2007. As someone who encouraged the purchase of ranchers for parks, flood control, and riparian values, celebrated the removal of livestock grazing from the Sheldon National Wildlife Refuge, pushed for less livestock grazing on public lands, I supposed I played my part in this reduction.</p> <p>Livestock grazing may remain the most pervasive use of public lands. Reductions or removal of livestock does not automatically trigger range repair; restoration of a range can take many years. Critical ranges should have no grazing; how does BLM justify three years before taking action?</p> <p>Today as ranches turn into ranchettes or are purchased by investors banking on future subdivisions and/or sale of water to urbanizing communities, ranching as a way of life is in retreat. Because ranches own many of the water sources surrounded by public lands, ranchers selling out may not be good for wildlife or public land management. Since ranches own many water sources on public lands, the potential change from rural use to water export or selling springs as ranchettes is also not good for wildlife. Horse advocates, as they are now doing, can purchase the ranches to maintain the open space. However, their use of grazing permits for animals that are not tractable has yet to be worked out.</p> <p>Therefore, removing livestock to stock more horses, and thereby encouraging the sale of private lands, needs to be cautiously approached. At this juncture, BLM's inability to remove excess horses in a timely manner has already forced some permittees to reduce use or take nonuse. The forage banking proposal is a positive step in providing support for ranchers.</p> <p>The rapid increase in horses and their impact on the range has become a major political and cost factor in public land management. The starting point for maintaining wild horse herds in Nevada should be maintaining the HMA's and AML established. BLM has been unable to remove excess horses; in fact, in some cases, horses have substantially exceeded the high number before removal action was taken. When horses were removed and subsequently counted, the number of horses remaining continue to exceed the high AML.</p>	I-Nappe-3: Action S 1.5 gives a range of alternatives applicable to biological crusts. Action D-S 1.5 includes minimizing excessive breaking up or shearing of biological crusts. Biological crusts are also addressed in site specific NEPA documents on a case-by-case basis, which may include mitigation measures to reduce adverse impacts to biological crusts.
I-Nappe –4	<p>Until BLM can maintain horses within "ecological health" of the land, providing accommodations for more horses i.e. water developments and acquiring property, only postpones the excess number issue. Water developments to disperse livestock were always suspect; because the result is overgrazing of what</p>	I-Nappe-4: Comment noted.

I-Nappe	Comments	Responses
I-Nappe-4 Cont-d	<p>had been historic grasslands. The Livestock section notes the Rangeland Health Standards; the horse section should reference the Horse and Burro Guidelines developed by the RAC in 2007.</p>	
I-Nappe –5	<p>With the limits of BLM resources, the focus needs to be on reducing the number of excess horses. The proposal is to remove horses to the lower AML and administer PZP to the mares being released. Presumably these two actions will postpone the need for roundup from two to four years. BLM is unlikely to have the resources to conduct those removals every four years and roundups are hard on horses. Is it possible to round up enough horses to give the lead stallions vasectomies, geld the other males, and sterilize mares over 10 years of age? The older mares would be healthier if they were not bearing young. The goal should be to reduce roundups to every 8 years or more.</p>	<p>I-Nappe-5: Action WHB 1.7 – Alternatives A,B, and D do not limit or restrict birth control methods for WH&B.</p>
I-Nappe –6	<p>Special recreation management areas are proposed. These area already subject to intensive OHV activity. The purpose of the designation is to acknowledge their heavy use and develop a management plan. These plans would be subject to a public issue identification process and public comment before being established. Amt I correct?</p> <p>Thank you for the opportunity to comment. This plan has been a long involved process and the result reflects your dedication.</p> <p>Sincerely,</p> <p>Tina Nappe</p>	<p>I-Nappe-6: A comprehensive travel & transportation management plan will be developed for each of the proposed SRMAs, and this process will involve extensive public input and review. Recreation management plans would be subject to separate NEPA process and will include opportunities for public participation.</p>

I-Novotny

Comments

Responses



comments@wdo.mmp
09/14/2010 02:40 PM

To wdrmp@blm.gov
cc
bcc
Subject Comments on RMP

Today'sDate = (0: '9/14/10')
FirstName = (0: 'Mary')
LastName = (0: 'Novotny')
Address = (0: '1645 Ala Wai Blvd. #1402')
City = (0: 'Honolulu')
ZipCode = (0: '96815')
State = (0: 'HI')
Telephone = (0: '')
email = (0: '')
CommentCategory = (0: 'Livestock Grazing')
Comment = (0: 'NO, I do not want cattle grazing within the subdivision. I am a private owner. Aloha, Mary Novotny')

I-Novotny-1

I-Novotny-1: Comment noted.

I-Nylen

Comments

Responses



Dorothy and Bob
<dcalconylan@gmail.com>
09/17/2010 03:24 PM

To: wdrrmp@blm.gov
cc:
bcc:
Subject: Winnemucca District RMP

I tried your online form but it wasn't working. Regarding the Winnemucca District RMP and wild horses and burros, no HMA's should be closed out. Unfortunately the BLM's reputation for science relating to wild horses and burros is poor. BLM's credibility is strained when documents are geared to make any reason thought of, reason enough to proceed. These are public lands and public horses. The horses need to be managed on the land. The BLM needs to await the study of your program by the National Academy of Sciences. No more removals of wild equines should be attempted until that is done.

I have been writing to BLM offices regarding various "gathers," to absolutely no avail. Needless to say I am very frustrated. Vast numbers of constituents have written concerns and responses to gathers and documents such as your RMP, but are ignored.

Both of my grandfathers were cattle ranchers. I have special interests in the land: conservation, wildlife and mining. I love public lands.

Sincerely,

Dorothy R. Nylen
310 Coral Way
Dayton, NV 89403
775 246 0434

I-Nylen-1: BLM has revisited WH&B management actions and analysis in the FEIS.

I-Nylen-1

I-Oster

Comments

Responses

ATTN: Winnemucca RMP
Bureau of Land Management
Winnemucca District Office
5100 East Winnemucca Blvd.
Winnemucca, Nevada 89445
c/o Bob Edwards



Dear Mr. Edwards,

In responding to the Winnemucca Draft Management Plan, I would like to make the following comments and suggestions:

I-Oster-1

Within the framework of the RMP, include legal land descriptions for all Wild Horse and Burro Herd Areas and Herd Management Areas.

I-Oster-2

Within the framework of the RMP, establish Wild horse and Burro allocations based on criteria recommended by the NATIONAL ACADEMY OF SCIENCES in order to achieve more accurate Appropriate Management Levels.

I-Oster-3

Adjust multiple use options to reflect a clear balance and equitable division of resources, and start reflecting 100 years of scientific studies and journals that definitively state cattle grazing is the most significant cause of riparian and watershed damage, and has been proven in areas where NO wild horses are allowed to roam.

I-Oster-4

Take into consideration grazing and migratory patterns and seasonal movement of herds.

I-Oster-5

Review all Herd Areas for reintroduction to Herd Area Status. Reasons for previous removals should be given a detailed analysis and subject to public review and consent.

Areas that have been designated as suitable for Wild Horse and Burro range should be devoted PRINCIPALLY as sanctuaries for their protection, as specified in the Free Roaming Wild Horse and Burro Act.

Public Viewing and Ecotourism:

I-Oster-6

Identify Herd Areas and Ranges that are unique and desirable for public viewing and tourism.
Promote and encourage tourism in these Herd Areas and Ranges.
Partner with local communities to help boost local economies. This would be a win/win program.

Management of Herd Areas:

I-Oster -7

Incorporate standards and methods into the RMP that clearly distinguish Wild Horse and Burro impacts from those of other livestock and rangeland users.

I-Oster -8

Mandate and implement the monitoring of usage levels PRIOR to introduction of livestock in a given area in order to clearly and accurately distinguish between the impacts of Wild Horses and Burros from that of other rangeland grazers.

I-Oster -9

Ensure that genetic viability of herds is protected by providing adequate resources and allocations to maintain a minimum of 150 animals on the range of individual HMAs at all times. This will prevent inbreeding, keep herds strong and allow them to thrive on public lands so that current and future generations will have the opportunity to enjoy these magnificent animals.

I-Oster -10

Protect predators in and around Herd Management Areas as a natural means of population control and balance.

I-Oster -11

Allow for migratory movement due to seasonal changes.

I-Oster -12

Herd Management Areas must be managed in such a way as to protect water sources and riparian areas from harmful activities such as natural gas and oil explorations as well as mining.

I-Oster-1: The Wild Horse and Burro Act did not specify legal descriptions in the designation of the HMAs and HAs. Several GIS layers are available to the public for downloading at:
http://www.blm.gov/nv/st/en/prog/more_programs/geographic_sciences/gis/geospatial_data.html. BLM must manage WH&Bs in accordance with the WH&B Act and applicable policy or guidance.

I-Oster-2: Establishing appropriate management levels based on monitoring and evaluations are implementation level decisions. Separate implementation planning and NEPA compliance would include public involvement.

I-Oster-3: Determining impacts based on monitoring with respect to WH&Bs and livestock is provided a D-WHB-5.7

I-Oster-4: Comment noted.

I-Oster-5 : Comment noted.

I-Oster-6: WH& B viewing areas have been added to the Watchable wildlife section.

I-Oster-7: Determining impacts based on monitoring with respect to WH&Bs and livestock is provided a D-WHB-5.7

I-Oster-8: Determining impacts based on monitoring with respect to WH&Bs and livestock is provided a D-WHB-5.7

I-Oster 9-Identifying and setting objectives for herd composition is an implementation decision. Separate implementation planning and NEPA compliance would include public involvement.

I-Oster-10: Managing of predators falls under jurisdiction of the Nevada Department of Wildlife.

I-Oster-11: Comment noted.

I-Oster-12: See water resources and Fish & Wildlife Objective - D-FW 9 and following actions.

I-Oster	Comments	Responses
I-Oster-13	Water sources must be monitored, maintained and repaired if and when necessary. This will enhance range conditions for a wildlife.	I-Oster-13: See all alternatives under LG 5.1 and BMPs #7 relating to livestock grazing.
I-Oster-14	<u>Fences:</u> Provide detailed information and analysis as to miles, kinds of and locations of fencing within each HA/HMA within each district.	I-Oster-14: BLM has furnished maps suitable for an RMP analysis. Several GIS layers are available to the public for downloading at: http://www.blm.gov/nv/st/en/prog/more_programs/geographic_sciences/gis/geospatial_data.html . See figure 2-6 Herd Areas and Figure 2-10 for location of HMAs
I-Oster –15	Reaffirm strict limitations on fencing in Wild Horse and Burro Herd Areas, Herd Management Areas or ranges in order to protect animals from injury or entrapment and to ensure the continuation of migratory and grazing patterns.	I-Oster-15: Determining impacts based on monitoring with respect to WH&Bs and livestock is provided a D-WHB-5.7
I-Oster –16	Remove fences that impede access to water sources.	I-Oster-16: Comment noted.
I-Oster -17	Any reductions of Wild Horses or Burros determined as “excess” must be accompanied by and balanced with equitable reductions in other livestock sharing the same Herd Management Area.	I-Oster-17: Comment noted.
I-Oster-18	Foals one year of age and younger should NOT be included in herd census calculations.	I-Oster-18: Comment noted.
I-Oster –19	Vehicular intrusions for the purposes of racing should be banned in Herd Management Areas.	I-Oster-19: Action D-WH&B 4.1 Addresses implementation of permit stipulations and mitigations measures relating to multiple uses and protection of WH&Bs.
I-Oster-20	Utilize range management to address Wild Horses and Burros who wander across the borders of Herd Management Areas, instead of permanently removing them.	I-Oster-20: Comment noted.
I-Oster-21	Incorporate RESERVE DESIGN as a basic blueprint for Herd Management and incorporate and utilize natural barriers and boundaries in order to keep herds from straying from Herd Management Areas.	I-Oster-21: Comment noted.
I-Oster-22	Prohibit management strategies that are based on “adoption criteria” as the primary consideration. This policy fails to conform to both the intent and the mandates of the Wild Horse and Burro Act. Incorporate management strategies that support historical herd traits. Respect equine social structure and keep families intact.	I-Oster-22: Disposal of Public lands is addressed at D-LR 3.1. Lands proposed suitable for disposal must meet requirements of FLPMA and criteria listed under this action.
	I am opposed to sales of Public Lands as they are held in trust for the American Public and they must be kept as such for future generations.	
	Please modify the current RMP to reflect the need to protect and maintain our wilderness areas for the wildlife which include our herds of Wild Horses and Burros.	

Respectfully,
 Sherry Oster
 3638 Park Dr.
 Cottonwood, Calif. 96022

I-Page

Comments

Responses

October 24, 2010

RECEIVED BLM
WINNEMUCCA NV

2010 OCT 27 PM 1:10

Dear Sir:

I am writing as a private citizen concerned about the wild horses & burros in the U.S.
I am concerned about the PRESERVATION of these herds that are part of our American heritage.
I am concerned about the INHUMANE helicopter roundups in the heat of summer & cold of winter.
I am also concerned about the WASTE OF TAXPAYER dollars in the execution of these roundups.

I would urge the Winnemucca District Office to revise the alternatives outlined in the Resource Management Plan and all other land use documents attached to it. I would ask that they instead ensure that the wild horse & burro management levels be increased through equitable distribution of resources.

I-Page-1

The Standard & Guidelines must ensure that wild horses & burros can thrive on the range. They should also be treated in a humane and less intrusive manner that preserves their wild & free-roaming nature. No proposed alternative provides sufficient protection for the wild horses and burros to be managed on the range. The Wild Horse & Burro Act mandates that wild horses and burros be considered an integral part of the natural system. The proposed plan does not uphold that mandate.

I-Page-2

Scientific and rational principles should be used to provide adequate herd size for genetic viability.

The resources should be allocated equitably. Ranching, oil & gas, & other commercial usages should not be allocated more resources or given preference over horses & burros.

I-Page-3

There should be no zeroing out of wild horse or burro herds. The BLM should consider reintroducing some of the herds that have been zeroed out.

Wild horses on the range help the environment. There is more damage done to the range by cattle than by horses. The wild horses & burros should be left as part of the ecosystem of these areas.

I-Page-4

I believe that if horses & burros are removed that there should be a public/private partnership in the care of these horses. Wild horse preserves, like the Soldier Meadows Ranch, could be a solution in these cases.

I have read that it costs the American Taxpayer \$2000 for the removal of a mustang from the range. Then there is the expense for the feed & care of the horses taken off the range. I believe that this is a WASTE OF TAXPAYER DOLLARS. Many Americans are hurting in these tough economic times.

I am sure that many would agree that it is a waste of tax money to remove these horses & burros. It is cheaper to leave them alone until further options & studies can be done.

Thank you.

Sincerely,



Linda Page, 11523 Vienna Way, Los Angeles, CA 90066

I-Page-1: Consistent with 43 CFR 4700.0-6, WH&B shall be managed in balance with other uses and the productive capacity of their habitat (i.e., WH&B will be managed to achieve and maintain a thriving natural ecological balance (TNEB) and multiple use relationships on the public lands). The WFRHBA requires the BLM to manage horses in a manner that is designed to achieve and maintain a thriving natural ecological balance on the public lands (16 USC § 1333(a)). See also *Animal Protection Institute of America*, 109 IBLA 112, 115 (1989) (—...the _benchmark test 'for determining the suitable number of wild horses on the public range is _thriving natural ecological balance'...) (Dahl v. Clark, 600 F. Supp. 585, 594 (D. Nev. 1984)). To achieve a TNEB on the public lands, WH&B should be managed in a manner that assures significant progress is made toward achieving the Land Health Standards for upland vegetation and riparian plant communities, watershed function, and habitat quality for animal populations, as well as other site-specific or landscape-level objectives, including those necessary to protect and manage Threatened, Endangered, and Sensitive Species. WH&B herd health is promoted by achieving and maintaining TNEB. Handbook 4700-1

I-Page-2: Baseline genetic diversity will be determined for all WH&B herds. Once a baseline is established, additional samples will be collected to reassess genetic diversity every other gather (e.g., every 6-10 years). If testing indicates diversity is less than desired, the herd should be reassessed more frequently (e.g., every gather). In the past, genetic diversity was assessed by evaluating blood samples from the herd. Hair samples are now used to assess genetic diversity. Procedures for collecting and processing WH&B hair samples are described in Appendix 1 (Genetics Data and Hair Sample Collection Instructions). A report assessing genetic diversity is developed for each set of samples from an HMA.

I-Page-3: Habitat for WH&B is composed of four essential components: forage, water, cover, and space. These components must be present within the HMA in sufficient amounts to sustain healthy WH&B populations and healthy rangelands over the long term. If they are not present in sufficient amounts, the authorized officer should consider amending or revising the LUP to remove the area's designation as an HMA. If the decision is made to return a designated HMA to HA status, the total population of WH&B should then be gathered and removed. See BLM Manual Section 4710.3.

A recurring pattern of WH&B movement out of the HMA to access forage, water, or thermal or hiding cover is an indication that year-long WH&B use cannot be sustained. If one or more of the key habitat components is missing, the HMA should be considered as unsuitable for year-long use. In these situations, the authorized officer should consider removing the area's designation as an HMA through LUP.

I-Perry-Jones et al

Comments

Responses

Jean Perry-Jones <jeanperryjones@yahoo.com>

09/22/2010 07:04 PM

To: wrloweb@nv.blm.gov

cc:

Subject: Winnemucca RMP, Edwards

Please protect areas with wilderness characteristics

- We support the RMP's identification of the following areas as having wilderness characteristics: Fencemaker, North Sahwave Mountains, Tobin Range and the two units in the Granite Range (Buckhorn Peak and Granite Peak).

I-Perry-Jones et al-1

- In addition, we request that you add these areas to the list of Wilderness Characteristics Areas:
 - The area directly south of the Blue Lakes WSA to the Sage Hen drainage, and
 - The highly-scenic core ridge of the Lava Beds including its western flank

I-Perry-Jones et al-1: The BLM brought forward seven areas that contain lands with wilderness characteristics. See D-WSA 2.1.

I-Perry-Jones et al-2

Management of Wilderness Characteristics Areas:

We ask that you more clearly define the management actions for protecting the Wilderness Characteristics Areas. These areas should be:

- Designated as "limited to designated routes,"
- Classified as a Class I for Visual Resource Management,
- Closed to mineral material disposal, mineral leasing and mineral entry,
- Included in rights-of-way exclusion areas, and
- Retained in public ownership.

I-Perry-Jones et al-2: See Action C-WSA 2.1.

I-Perry Jones et al-3

Wilderness Study Areas:

- We support designating all WSAs as "limited to designated

I-Perry Jones et al-3: This will be addressed and brought forward in the subsequent Transportation & Travel Management Planning processes.

I-Perry-Jones et	Comments	Responses
I-Perry-Jones et al-3 Cont-d.	<p>↑ routes" and we stress that a high priority should be given to identifying these routes with signs and on maps;</p> <ul style="list-style-type: none">● High priority also should be given to promptly restoring wilderness character from damage created by vehicle incursions within the WSAs, and● We support the acquisition of private inholdings in WSAs, Wilderness and in Wilderness Characteristics Areas to enhance wild character.	I-Perry-Jones et al-4 : See response I-Perry Jones et al-3.
I-Perry-Jones et al-4	<p>Jean Perry-Jones Alan Bernhard Tom Jones V 4470 Aspen Ave Mt Charleston NV 89124 702-858-3653 702-317-3803 fax jeanperryjones@yahoo.com</p>	

I-Peterson

Comments

Responses

Will Roger Peterson
<will@willroger.com>

09/15/2010 04:37 PM

To: Robert_Edwards@blm.gov
cc: Will Roger Peterson <will@willroger.com>, Roger Farschon <Roger_Farschon@ca.blm.gov>, Gene Seidlitz <gene_seidlitz@nv.blm.gov>, Jessica Clayton <JTCclaytone@aol.com>, Ray Allen <ray@burningman.com>
Su Re: Proposed land exchange.
bje
ct

Dear Mr. Bob Edwards,

Approximately two years ago (2008) I was promised, by then acting District Manager Roger Bryan, that the Hualapai Flat and some of the adjacent public lands would be put on the BLM's disposable lands listing. I was surprised to see that this was not included on the Draft Winnemucca District Resource Management Plan (RMP). I am writing this per our phone conversation today to place this parcel on the final RMP. The intended parcel is roughly bounded by Route 34 on the South, Soldier Meadow Road to the East, the Fly Ranch to the West, and the Jackson Ranch to the North.

-

Thank you for your consideration

-

Will Roger Peterson
Vice-President, Friends of the Black Rock/High Rock
Chairman, Sierra Front- Western Great Basin- Resource Advisory Council
Chairman, RAC NCA Subgroup
Member, Board of Directors, Black Rock City LLC
Member, Board of Directors, Black Rock Arts Foundation
Mobile (775) 750-6252
<will@blackrockdesert.org>

I-Peterson-1: GIS mapping of disposal areas have been revisited in the FEIS.

I-Peterson-1

I-Rudnicki

Comments

Responses



Susan Rudnicki
susanrudnicki@gmail.com
 10/24/2010 09:38 AM

To: wdmp@blm.gov
 cc:
 bcc:
 Subject: Winnemucca RMP

Winnemucca Draft Resource Management Plan

AS a citizen of the United States and a taxpayer I submit the following comments regarding the 'management' plans of BLM for the wild horse and burro populations Congress rendered under their care:

I support Alternative C as well as the incorporation of the following recommendations in all Alternatives and analysis in the Final Environmental Impact Statement and Record of Decision.

- I-Rudnicki-1 : > Include legal land descriptions for all Herd Areas and Herd Management Areas.
- I-Rudnicki-2 > Review all Herd Areas within the planning area for reintroduction to Herd Management Status as required by CFR 4700.3-1. Provide a detailed analysis and reasons for previous withdrawals as well as potential mitigation measures that may reinstate wild populations on legally designated Herd Areas.
- I-Rudnicki-3 > Identify wild horse and burro use areas as suitable for designation as wild horse and burro "ranges" to be devoted principally as sanctuaries for their protection and preservation as per Section 1333(a) of the Wild Free-Roaming Horse and Burro Act and 43 C.F.R. 4710.3-2.
- I-Rudnicki-4 > Develop Alternatives that incorporate the designation of ACECs (Areas of Critical Environmental Concern) for all remaining wild burro herds and the critical habitat and resources if necessary to insure self-sustaining genetically viable populations within the planning area as per the FLMPA, Section 202 [43 U.S.C. 1712] (a)(3) for long-term sustainability.
- I-Rudnicki-5 > Identify Herd Areas, Herd Management Areas and Ranges that provide unique opportunities to develop public viewing opportunities and/or development of ecotourism based on the promotion of wild herds as well as including an analysis of potential economic benefits this would bring to local communities.
- I-Rudnicki-6 > Identify any bands or herds that use two or more Herd Management Areas to secure suitable year-long habitat and resources based on environmental conditions, migratory patterns or seasonal movement.
- I-Rudnicki-7 > Base wild horse and burro resource allocations on scientific and rational principles. Incorporate suitability criteria be established within the framework of the RMP as recommended by the National Academy of Science over 30 years ago to better reflect actual use and available forage for free-roaming populations to achieve accurate appropriate management levels and

I-Rudnicki-1: The Wild Horse and Burro Act did not specify legal descriptions in the designation of the HMAs and HAs.

Several GIS layers are available to the public for downloading at:
http://www.blm.gov/nv/st/en/prog/more_programs/geographic_sciences/gis/geospatial_data.html

I-Rudnicki-2: Comment noted.

I-Rudnicki-3: Comment noted.

I-Rudnicki-4: Wild Horses and Burros are managed in accordance with the Wild Horse and Burro Act.

I-Rudnicki-5: Comment noted.

I-Rudnicki-6: Comment noted.

I-Rudnicki-7: Comment noted.

I-Rudnicki	Comments	Responses
	“excess” determinations.	
I-Rudnicki –8	> Develop and incorporate within the framework of the RMP the methodology used to distinguish wild horse and burro impacts from livestock and other rangeland users. One potential method is to mandate monitoring and utilization levels be measured prior to the introduction of livestock in a given area order to distinguish class use and impacts.	I-Rudnicki-8: Comment noted.
I-Rudnicki –9	> In all Herd Management Areas, assure management plans will provide allocations and resources adequate to maintain a minimum of 150 animals at all times on the range per individual HMA as necessary to maintain long-term genetic viability according to the best available science. This will prevent inbreeding or population crashes as required by CFR 4700.0-6(a) and to ensure that populations are being managed as an integral part of the natural systems of the public lands.	I-Rudnicki-9: Comment noted.
I-Rudnicki –10	> In individual Herd Management Areas, prohibit management plans and strategies that fail to provide for self-sustaining wild horse and burro populations lower than a minimum population of 150 animals based on the concept of “genetic interchange” between bands or herds from different Herd Management Areas. The only exception to this could be if BLM can conclusively document known population interchanges by photographs or other identifiable markings of animals on a multiple and consistent long-term basis.	I-Rudnicki-10: Comment noted.
I-Rudnicki –11	> If necessary to provide habitat for wild horses or burros, to implement herd management actions, or to protect wild horses or burros from disease, harassment or injury, invoke BLMs authority to reduce or close areas of public lands to grazing use by all or a particular kind of livestock as established by C.F.R. 4710.5 (a), with the goal of maintaining self-sustaining genetically viable wild horse and burro populations through allocations assuring resources are adequate to maintain a minimum of 150 animals at all times on the range per individual HMA.	I-Rudnicki-11: The Taylor Grazing Act authorizes the use of rangelands to livestock grazing, the Wild Horse & Burro Act established HMAs and provided protection for WH&B. The Federal Land Management and Policy Act (FLPMA) mandates that the BLM administered land be managed for multiple uses. Livestock grazing and WH&B are both uses authorized to occur on BLM administered land. The RMP analyzes several proposed levels of livestock management, up to and including elimination of livestock grazing.
I-Rudnicki –12	> Prohibit the use of “blanket” management options that allow for wild horse and burro reductions without supporting data to make excess determinations, i.e., “in the absence of species specific data, equitable reductions in livestock and wild horse and/or burros authorizations will be implemented.” The historical problem with the management approach of authorizing “equitable reductions” is there is no accountability or consequence to BLM if they fail to reduce the livestock portion of the projected reductions. Traditionally, BLM has removed wild horses and/or burros or reduced their population objectives while making no changes or increasing livestock authorizations shortly after applying changes exclusively to free-roaming populations.	I-Rudnicki-12: Comment noted.
I-Rudnicki –13	> Prohibit the issuance of non-renewable grazing permits in any wild horse and burro Herd Area. Herd Management Area or Range in order to allow maximum long-term rangeland health due to year long grazing pressure in these designated areas.	I-Rudnicki-13: Refer to D-LG 1.11.
I-Rudnicki-14	> Establish criteria within the RMP framework for incorporating periodic monitoring at “key” times to establish data on available water. This should include mandatory flow rates, water quality data, status of historic sources (in order to collect trend data on water availability) and photographic evidence to establish credibility in BLMs data.	I-Rudnicki-14: BLM policy and technical references define methods for monitoring and meeting watershed, riparian, and aquatic health and functionality standards.

	I-Rudnicki	Comments	Responses
I-Rudnicki – 15		> Various related multiple use decisions issued by the Winnemucca Field Office as well as surrounding areas indicate the potential for significant and cumulative impacts to underground aquifers and water sources due to drawdown. Incorporate provisions within the RMP that provide mitigation measures for water loss, increase available habitat, disperse consolidated grazing pressures, and insure supplemental low cost water sources are available in times of drought or harsh environmental conditions for wild horses and burros as well as other wildlife species within the planning area.	15-Rudnicki-15: This action is an implementation level decision, not an RMP level decision. During the implementation level planning process a separate public involvement and NEPA analysis will be conducted.
I-Rudnicki – 16		> Prohibit the use of any sterilization measures on populations that fall below the minimum genetic threshold of 150 animals or less and assure balanced gender structures to preserve natural herd behaviors and social dynamics.	I-Rudnicki-16: Comment noted.
I-Rudnicki- 17		> Prohibit the inclusion of foals one year and under in population inventories and calculations occurring on the range for “excess” population determinations.	I-Rudnicki-17: Comment noted.
I-Rudnicki – 18		> Establish population objectives and thresholds for big game species within the planning area to insure habitats support a “thriving natural ecological balance” between all species. The current policy to omit critical information on species populations, increased pressure on resource requirements and their resulting impacts fails to conform to federal law mandating scientifically sound management decisions and quality data to determine suitable habitat for all rangeland users. As public stewards, BLM needs to recognize and honor their position to preserve and protect all resources for the American people, both now and for future generations. State wildlife agencies have a vested interest in increasing big game populations to increase revenue. As such, studies, data, recommendations and management objectives may contain inherent “conflicts of interest” and biased towards the balanced management of resources on public lands.	I-Rudnicki-18 : The BLM works in cooperation with the Nevada Department of Wildlife (NDOW) in the management of big game habitat; NDOW manages big game populations. Under a multiple-use mandate, the BLM strives to achieve a balanced management of public land resources.
I-Rudnicki – 19		> Provide for public review a detailed examination and analysis of all current multiple use applications within each Herd Area and Herd Management Area within the planning area. This is to include current livestock authorizations, the percentage each allotment overlaps existing wild horse and burro areas as well as maps clearly showing the relationship and resource allocations between livestock and wild equids within the planning area. The purpose of this information is to help the public be reasonably informed as to BLMs compliance with the Act’s mandate to accomplish the protection of wild free-roaming horses and burros through their consideration as an integral part of the natural system of the public lands as well as their relationships with other uses of the public and adjacent private lands as outlined in CFR 4710.3.	I-Rudnicki-19: Comment noted.
I-Rudnicki- 20		> With respect to wildlife impacts to critical resources required by wild horse and burro populations, provide current estimated big game populations such as elk, pronghorn, mule deer and bighorn, populations affecting the wild horse and burro areas within the planning district, reasonably foreseeable future big game population objectives for these same areas that may impact management strategies to maintain self-sustaining genetically viable herds.	I-Rudnicki-20: Management of big game species and populations are under the jurisdiction of the Nevada Department of Wildlife (NDOW) and is outside the scope of this analysis . See section 1.6 Planning Criteria and Legislative Constraints #3. The BLM works in cooperation with NDOW in the management of big game habitat. Under a multiple-use mandate, the BLM strives to achieve a balanced management of public land resources.
I-Rudnicki- 21		> All other multiple use authorizations within Herd Areas and Herd Management Areas such as current mining, oil and gas operations as well as renewable resource projects such as solar, wind or geothermal impacting or reasonably projected to impact habitat and/or resources in the	I-Rudnicki-21: See response I-Rudnicki-15. All Renewable Energy Plans of Developments subject to a federal action are required to be reviewed under NEPA.
			BLM has furnished maps suitable for an RMP analysis. Several GIS layers are available to the public for downloading at: http://www.blm.gov/nv/st/en/prog/more_programs/geographic_sciences/gis/geospatial_data.html

I-Rudnicki

Comments**Responses**I-Rudnicki –
21
Cont-d

↑ Winnemucca Herd Areas and Herd Management Areas as well as projects or proposals that can be expected to be implemented in the reasonably foreseeable future. This should include a detailed map of each Herd Area and Herd Management Area in the planning area to allow the interested public to assess the impacts of other multiple uses to wild horse and burro habitat and populations in a site-specific manner.

Sincerely,
Susan Rudnicki
804 Fifth St
Manhattan Beach CA 90266 310-374-4779

	I-Rudnicki Comments	Responses
I-Rudnicki – 22	> Prohibit the inclusion of foals one year and under in population inventories and calculations occurring on the range for “excess” population determinations.	I-Rudnicki 22: Comment noted.
I-Rudnicki – 23	> Establish population objectives and thresholds for big game species within the planning area to insure habitats support a “thriving natural ecological balance” between all species. The current policy to omit critical information on species populations, increased pressure on resource requirements and their resulting impacts fails to conform to federal law mandating scientifically sound management decisions and quality data to determine suitable habitat for all rangeland users. As public stewards, BLM needs to recognize and honor their position to preserve and protect all resources for the American people, both now and for future generations. State wildlife agencies have a vested interest in increasing big game populations to increase revenue. As such, studies, data, recommendations and management objectives may contain inherent “conflicts of interest” and biased towards the balanced management of resources on public lands.	I-Rudnicki 23: See response I-Rudnicki-20.
		I-Rudnicki 24: Comment noted.
		I-Rudnicki 25: See response I-Rudnicki-20.
		I-Rudnicki 26: See response I-Rudnicki-21.
I-Rudnicki- 24	> Provide for public review a detailed examination and analysis of all current multiple use applications within each Herd Area and Herd Management Area within the planning area. This is to include current livestock authorizations, the percentage each allotment overlaps existing wild horse and burro areas as well as maps clearly showing the relationship and resource allocations between livestock and wild equids within the planning area. The purpose of this information is to help the public be reasonably informed as to BLMs compliance with the Act’s mandate to accomplish the protection of wild free-roaming horses and burros through their consideration as an integral part of the natural system of the public lands as well as their relationships with other uses of the public and adjacent private lands as outlined in CFR 4710.3.	I-Rudnicki-27: WH&B management with respect to fencing is addressed in WHB 2. Herd Management Areas are addressed when multiple use proposals occur within these areas in site specific NEPA analysis. These documents are made available to the public.
I-Rudnicki – 25	> With respect to wildlife impacts to critical resources required by wild horse and burro populations, provide current estimated big game populations such as elk, pronghorn, mule deer and bighorn, populations affecting the wild horse and burro areas within the planning district, reasonably foreseeable future big game population objectives for these same areas that may impact management strategies to maintain self-sustaining genetically viable herds.	I-Rudnicki-28: See response I-Rudnicki-20.
I-Rudnicki – 26	> All other multiple use authorizations within Herd Areas and Herd Management Areas such as current mining, oil and gas operations as well as renewable resource projects such as solar, wind or geothermal impacting or reasonably projected to impact habitat and/or resources in the Winnemucca Herd Areas and Herd Management Areas as well as projects or proposals that can be expected to be implemented in the reasonably foreseeable future. This should include a detailed map of each Herd Area and Herd Management Area in the planning area to allow the interested public to assess the impacts of other multiple uses to wild horse and burro habitat and populations in a site-specific manner.	
I-Rudnicki- 27	> Include detailed analysis of the miles, kinds and locations of fencing within each HA/HMA within the planning district. Reaffirm strict limitations on fencing in wild horse and burro Herd Areas, Herd Management Areas or Ranges in order to preserve their free-roaming behaviors and to prevent entrapment, injury, death or undue degradation of resources due to limitations on seasonal or migratory movement.	
I-Rudnicki- 28	> Incorporate protections for predators in and around herd management areas as a management	

I-Rudnicki	Comments	Responses
	<p>tool for low cost population control and to support the “thriving natural ecological balance”.</p> <p>> Prohibit management strategies that are based on “adoption criteria” as the primary consideration. This policy fails to conform to both the intent and the mandates of the Act. Incorporate management strategies that support historical herd traits and local community values for the bands/herds.</p> <p>> Utilize range management to address wild horses and burros who wander across the borders of Herd Management Areas (HMAs), instead of permanently removing them.</p> <p>> Removals of any kind should be rare and minimal. Other methods of management must be employed first and given a fair opportunity to succeed. If a limited removal is necessary, it must be done in a humane manner that respects horse social structure and keeps families intact.</p> <p>~DEADLINE~ MONDAY, OCTOBER 25, 2010 4:30 P.M. PST</p> <p>SUBMIT TO: Winnemucca RMP c/o Bob Edwards Attn: Winnemucca RMP Bu</p>	

I-Salerno

Comments

Responses

Marcia Salerno <marcias@spottradingllc.com>

10/21/2010 07:28 PM

To: "wfoweb@blm.gov" <wfoweb@blm.gov>
cc
Subject: RMP

You have an opportunity to show what kind of people you are by doing the humane, logical and best thing for our generation and those that follow. How could you sleep at night knowing you supported running animals to death, scaring them to death literally and never letting a living, natural thing alone? If you do not cease the horrible actions from the past and from what appears that you are hell bent on doing in the present and future, you can consider the BLM animal Nazi's. I sound like one of those lunatics that goes over the edge, but I am almost 62 years old and I'm tired of not having my say so and possibly input on what happens in my country. I've paid my taxes and my dues. LISTEN PLEASE.

Marcia Salerno
Westmont, IL

Marcia Salerno
Payroll Administrator & Executive Assistant

Spot Trading L.L.C.
440 South LaSalle St., Suite 2800
Chicago, IL 60605
Office: 312.362.4550
Direct: 312-362-4565
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marcias@spottradingllc.com
www.spottradingllc.com

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I-Salerno-1: Comment noted.

I-Salerno-1

I-Smith

Comments

Responses

Oct. 22. 2010 3:19PM DEPY HUMAN SERVICES

No. 4438 P.

ATTN: WINNEMUCCA RMP
FAX 775-623-1503

October 22, 2010

Mr Bob Edwards
Winnemucca District Office
Bureau of Land Management
5100 E Winnemucca Blvd
Winnemucca, NV 89445-2921

Dear Mr Edwards:

I am contacting you regarding the Bureau of Land Management's program for wild horses and burros which has been a concern for me for years. I understand the need to plan for the number of animals but appropriate management through equitable distribution of resources must be considered. These horses and burros are a vitally important part of our American heritage and we owe it to them to preserve their familial ties and provide adequately for their needs. We do not need to terrorize them with helicopter roundups or other intrusive and inhumane practices. The lands they roam are public lands and they are not to be used solely or mostly for private grazing land. I have often felt these lands are leased to wealthy ranchers and their requests take top priority with our government.

Your currently proposed Resource Management Plan does not ensure that these wild animals will maintain an integral part of their own natural habitat. Please support public-private partnerships for wild horse and burro preserves. We should also protect horses' natural predators in these areas as nature can often do a much better job of handling our natural resources than we have proven that we can. I would also like to ask that you ban motorized vehicle intrusions from these lands due to disturbance of property and animals.

Thank you very much for reading my letter and giving your help to animals which cannot speak for themselves. I try to do that at every opportunity and you are in the position to do something about this important matter.

Sincerely,


Mary Ann Smith
1010 West F Street
Jenks, OK 74037

I-Smith-1:

The BLM adheres to the requirements under the WH&B Act.

I-Smith-1

I-Solis

Comments

Responses

Mr. Bob Edwards
Winnemucca District Office
Bureau of Land Management
5100 East Winnemucca Blvd.
Winnemucca, NV 89445-292

December 28 2010

RECEIVED BLM
WINNEMUCCA NV
2010 DEC 23 PM 12:52

Dear; Winnemucca RMP, Edwards, BLM Winnemucca
District Office; President Obama, White House, and
Department of Interior

I urge the Winnemucca District Office to revise the proposed alternatives outlined in the Draft Resource Management Plan (RMP) and all other land-use documents tied to it to ensure that wild horse and burro appropriate management levels (AML) are increased through equitable distribution of resources.

I-Solis-1

The Standards and Guidelines must ensure that wild horses can thrive on the range and be treated in a humane and minimally-intrusive manner that preserves their wild and free-roaming behavior. No proposed alternatives provide sufficient protection for wild horses and burros to be managed on the range. The Wild Free-Roaming Horses and Burros Act mandate that wild horses and burros be considered "an integral part of the natural system." This proposed RMP fails to uphold that mandate. I urge that the following tenets be incorporated into Alternative C2 in the RMP:

I-Solis-2

- Designate all Herd Management Areas (HMAs) to be managed principally for wild horse or burro herds as allowed under 43 C.F.R. 4710.3-2. Decrease or eliminate livestock grazing in HMAs pursuant to 43 C.F.R. 4710.5(a).

I-Solis-3

- Base AMLs on scientific and rational principles that provide adequate herd size for genetic viability.

- Allocate resources equitably. Ranching and other commercial usages should not be allocated more resources or given preference over wild horses and burros.

- No "zero-ing out" of wild horse or burro herds. Range rotation, re-seeding, and temporary fencing should be among the tools used to protect and restore any areas that do not meet habitat or rangeland standards.

- Re-evaluate "zero-ed out" herd areas for horse/burro reintroduction.

- Utilize range management to address wild horses and burros who wander across the borders of Herd Management Areas (HMAs), instead of permanently removing them.

- Removals of any kind should be rare and minimal. Other methods of management must be employed first and given a fair opportunity to succeed. If a limited removal is necessary, it must be done in a humane manner that respects horse social structure and keeps families intact.

- Range management and controlling populations on the range should be the cornerstone of management of wild horses and burros. As such, the development of water resources, such as a system of guzzlers, should be a prominent feature of the RMP.

I-Solis-4

- Support public-private partnership for on-the-range management of wild horses and burros and the creation of wild horse preserves (i.e. Soldier Meadows proposal).

I-Solis-1: Consistent with 43 CFR 4700.0-6, WH&B shall be managed in balance with other uses and the productive capacity of their habitat (i.e., WH&B will be managed to achieve and maintain a thriving natural ecological balance (TNEB) and multiple use relationships on the public lands). The WFRHBA requires the BLM to manage horses in a manner that is designed to achieve and maintain a thriving natural ecological balance on the public lands (16 USC § 1333(a)). See also *Animal Protection Institute of America*, 109 IBLA 112, 115 (1989) (—"the benchmark test 'for determining the suitable number of wild horses on the public range is thriving natural ecological balance'..." (Dahl v. Clark, 600 F. Supp. 585, 594 (D. Nev. 1984)). To achieve a TNEB on the public lands, WH&B should be managed in a manner that assures significant progress is made toward achieving the Land Health Standards for upland vegetation and riparian plant communities, watershed function, and habitat quality for animal populations, as well as other site-specific or landscape-level objectives, including those necessary to protect and manage Threatened, Endangered, and Sensitive Species. WH&B herd health is promoted by achieving and maintaining TNEB. Handbook 4700-1. Based on the requirements of FLPMA, BLM must manage public lands for multiple use. The WH&B management actions and analysis will be re-visited in the Final RMP/ FEIS.

I-Solis-2: Baseline genetic diversity will be determined for all WH&B herds. Once a baseline is established, additional samples will be collected to reassess genetic diversity every other gather (e.g., every 6-10 years). If testing indicates diversity is less than desired, the herd should be reassessed more frequently (e.g., every gather). In the past, genetic diversity was assessed by evaluating blood samples from the herd. Hair samples are now used to assess genetic diversity. Procedures for collecting and processing WH&B hair samples are described in Appendix 1 (Genetics Data and Hair Sample Collection Instructions). A report assessing genetic diversity is developed for each set of samples from an HMA.

I-Solis-3: Habitat for WH&B is composed of four essential components: forage, water, cover, and space. These components must be present within the HMA in sufficient amounts to sustain healthy WH&B populations and healthy rangelands over the long term. If they are not present in sufficient amounts, the authorized officer should consider amending or revising the LUP to remove the area's designation as an HMA. If the decision is made to return a designated HMA to HA status, the total population of WH&B should then be gathered and removed. See BLM Manual Section 4710.3.

A recurring pattern of WH&B movement out of the HMA to access forage, water, or thermal or hiding cover is an indication that year-long WH&B use cannot be sustained. If one or more of the key habitat components is missing, the HMA should be considered as unsuitable for year-long use. In these situations, the authorized officer should consider removing the area's designation as an HMA through LUP.

I-Solis-4: Comment noted.

I-Solis

Comments

Responses

- Incorporate protection for predators in and around herd management areas as a part of managing wild horses and burros.

- Ban vehicular intrusions for the purposes of racing.

I support the removal of fencing impediments and the enhancement of water resources.

I urge you to please, please allow the horse's to have some type of free range and water without pressure's to keep moving around in unstable home grounds.

I urge you to please respect the humanity of foals not being able to run fast enough to keep up with there adult family and who at times get hurt or lost from their family.

I urge you to please allow the original In-The-Wild-Management program to start. It's been said that this program would save thousands of USA tax dollars for the Government and it's people. Surely the Wild Horse can help the American *ground* as they are independently have for the past 100 years. Certainly the Majestic Independent Wild Horse's had some kind of beauty to our country and is a national icon as well. They are being mis-blamed or mis-understood for drinking all the water from the lakes, ponds, and reservations of water when in fact the Wild Horse's only drink once and to the most 2 times a day.

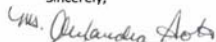
They are being mis-blamed and mis-blamed for messing up areas when it is a fact the cattle are known to do this instead and not the horses. There just minding their own business in the harsher of area conditions and re-locations.

It been said that since the 100 year act protecting the Wild Horses has been broken due to the President Bush Administration for the past 10 years. The Wild Horse & Burros have not been animal ethically treated or conserved within their own independent means of the Wild-Free-Roam act. This management system has not been successful in its management of the Wild Horses & Burros.

Please do not eliminate and extinguish these misunderstood majestic wild horses and burros that cannot be heard but are only a gift from the divine for human beings to enjoy in view, and company and help.

Thank you for your time, courtesy, and consideration for acknowledging this letter and re-considering the Wild-Free-Roaming Horse & Burro Act.

Sincerely,



Ms. Alexandra Solis
P.O. Box 0184
Campbell Hall, NY 10916-0184

I-Sparky	Comments	Responses
Bob Sparky <couchtaativentureclub@yahoo.com>	To: wrloweb@nv.blm.gov cc: Subject: "Winnemucca RMP, Edwards"	
09/15/2010 05:39 PM		
Comment for the Draft Resource Management Plan (RMP) and Draft Environmental Impact Statement (EIS) replacement of the "The RMP will		
replace two outdated Management Framework Plans (MFPs) approved in 1982 and amended in 1999"		
I-Sparky-1	My concerns are that of "what needs to be updated? Updating needs to include the recreation of The People by means of motorized and non-motorized recreation. Recreation shall be accessible 365 days a year for families to enjoy. Trails shall be implemented to accept motorized and non-motorized recreation. Volunteers shall have the ability to perform many task as needed for the area of 8,448,130 acres responsibly for trails and the needs of those whom will recreate there.	I-Sparky-1: A Comprehensive Transportation & Travel Management Plan (CTTMP) will address these concerns after the Record of Decision for the RMP is signed. The CTTMP will be determined with full public participation and input.
Once approved, the RMP will guide the management of federally approved activities on approximately 8.4 million acres of BLM-administered public lands and minerals in all of Humboldt and Pershing Counties, and portions of Washoe, Churchill and Lyon Counties.		
I-Sparky-2	Confirmed studies private and federally shall be performed to confirm the needs set forth by BLM.	I-Sparky-2 Comment Noted:
The BLM developed the alternatives described in the RMP with input from other federal agencies, tribal, state and local governments, the Resource Advisory Council and the general public.		
The Winnemucca District (WD) is currently evaluating various management alternatives for the 8,448,130 acres of federally owned lands (let it be known that "federally owned lands are that of The People of the United States of America") that lie within the WD's jurisdiction. The selected management alternatives will form a planning document titled the Winnemucca District Office Resource Management Plan (RMP). The RMP is being developed in order to update and replace the existing Sonoma-Gerlach and Paradise-Denio Management Framework Plans (1982) (amended 1999). For more information why the RMP is being developed.		
I-Sparky-3	Comment: The area of 8,448,130 acres is of great concern and ample time needs to be given in order to make an educated decision. The People require the same amount of time for making responses as the government spends on the time they have done with this. Areas that are commented as "Federal Land" are truly that of the American People.	I-Sparky-3 Comment Noted:

Comments

Responses

I-Sparky

The area here mentioned shall remain accessible to the American People for recreational use and enjoyment.

Robert Brooks
P. O. Box 5923
Ocala, Fla. 34478
352-207-3102

Founder www.OuachitaATVAdventureClub.org

Working to protect Land Rights Use for Responsible Recreation

Check out Blog and Follow with us <http://hittinrails.blogspot.com/>

OHVCCTread Lightly!Trail Trainer!

NOHVCCASI CERTIFIED

Blue Ribbon CoalitionUSFS Chain Saw Cert.

ARRAFormer Paramedic

Recreational Incident Command

ATV Trail Ambassador/Trail Advocate/Trail Consultant

American Land Rights Association

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I-Spotts

Comments

Responses

Richard Spotts

From: "Richard Spotts" <spotts@infowest.com>
To: <wfoweb@nv.blm.gov>
Sent: Saturday, September 18, 2010 11:41 AM
Subject: My comments on BLM Winnemucca DRMP and DEIS

September 18, 2010

Mr. Bob Edwards
 Winnemucca District Office
 U.S. Bureau of Land Management
 5100 E Winnemucca Blvd.
 Winnemucca, NV 89445-2921

RE: My comments on the BLM Winnemucca District Office Draft Resource Management Plan (DRMP) and Draft Environmental Impact Statement (DEIS).

Dear Mr. Edwards and other BLM officials:

Please consider this letter with my comments on the above-referenced DRMP and DEIS, and include this letter in the appropriate administrative record.

At the outset, I have a longstanding interest in the management of BLM lands. Over the past thirty plus years, I have enjoyed hiking and wildlife watching on BLM lands throughout the West, including in Nevada. I believe that BLM has a tough job of trying to balance various use demands and public expectations. However, I believe that the bottom line should be the dominant priority of protecting or restoring landscape health. The FLPMA "sustained yield" mandate requires that no uses be authorized which could remove or irreversibly diminish the landscape's ability to provide for other beneficial uses, such as healthy vegetation and wildlife communities.

For example, I am very concerned about the continuing expansion of cheatgrass and other harmful invasive/noxious weeds, and how these weeds can alter natural fire patterns and fuel loads in potentially devastating ways. I am also very concerned about the continuing creation of illegal OHV routes that cause visual scarring, soil erosion, habitat fragmentation, and aid weed colonization and spread. I believe that all OHV uses should be kept to designated routes, and that no future cross-country OHV uses should be authorized (including for game retrieval, antler harvest, or dispersed camping).

With this background in mind, I have some more specific comments under the following headings:

Wilderness Characteristics Areas

- I strongly support the DRMP's identification of the following areas as having wilderness characteristics: Fencemaker, North Sahwave Mountains, Tobin Range and the two units in the Granite Range (Buckhorn Peak and Granite Peak).
- In addition, I recommend that you add these areas to the list of Wilderness Characteristics Areas:

2010 SEP 22 PM 1:09
 RECEIVED BLM
 WINNEMUCCA NV

I-Spotts-1

I-Spotts-1: The BLM brought forward seven areas that contain lands with wilderness characteristics. See D-WSA 2.1.

9/18/2010

I-Spotts

Comments

Responses

- o the area directly south of the Blue Lakes WSA to the Sage Hen drainage, and
- o the highly-scenic core ridge of the Lava Beds including its western flank.

Management of Wilderness Characteristics Areas

I recommend that you more clearly define the management actions for protecting the Wilderness Characteristics Areas as follows. These areas should be:

- designated as "limited to designated routes,"
- classified as a Class I for Visual Resource Management,
- closed to mineral material disposal, mineral leasing and mineral entry,
- included in rights-of-way exclusion areas, and
- retained in public ownership.

Wilderness Study Areas

- I strongly support designating all WSAs as "limited to designated routes" and recommend that a high priority should be given to identifying these routes with signs and on maps;
- I strongly recommend that a high priority should be given to promptly restoring wilderness character from damage created by vehicle incursions within the WSAs, and
- I strongly support the willing seller acquisition of private inholdings in WSAs, Wilderness and in Wilderness Characteristics Areas to protect and enhance wilderness character.

I-Spotts-2: See Action C-WSA 2.1.

I-Spotts-2

I-Spotts-3

I am also very concerned about climate change and the potential for more erratic weather patterns that may include extended droughts. As such, I believe that a higher priority should be placed on identifying, inventorying, monitoring, and maintaining or restoring all water sources for wildlife, including natural springs and seeps. The combination of drought from climate change and excessive groundwater pumping for human uses in some areas may greatly jeopardize these surface water sources for wildlife. I believe that BLM can and should be more proactive about identifying waters at future risk, and working to resolve problems before those waters are lost to wildlife. I hope that BLM officials will work more effectively with state and local officials, and affected ranchers and other stakeholders, to ensure that wildlife continues to have access to the surface waters they need to survive. Indeed, in some places, there are also endemic aquatic species, such as springsnails, that are threatened with extirpation or even extinction if their water habitats are lost.

Thank you very much for considering my comments.

Sincerely,



Richard Spotts

1125 W. Emerald Drive

St. George UT 84770-6026

spotts@infowest.com

I-Spotts-3: See Action C-WR-3.

I-Stammers

Comments

Responses

Donna Stammers
P.O. Box 124
Gerlach, NV 89412

October 20, 2010 REVISED

Bureau of Land Management
Winnemucca District Office
5100 East Winnemucca Blvd.
Winnemucca, NV 89445
Attn: RMP Team

RE: Comments on Draft Resource Management Plan and EIS for the Winnemucca District Office of the Bureau of Land Management

Dear Mr. Seidlitz,

Thank you for the opportunity to comment on the Winnemucca District Office DRMP and EIS. Below are my comments on how I would like to see the Black Rock Field Office portion of the DRMP managed.

Granite Mountain Special Recreation Management Area: I prefer Alternative A.

1. The Documentation of Current Wilderness Inventory Condition of 2009 is flawed. The same Findings and Conclusion can be made to the document, that it does NOT meet Wilderness Characteristics.
2. Not shown on your maps are the numerous roads all over the Granite Mountain Range that are used by many of the local people, hunters, mountain bikers, elderly and disabled just to name a few that recreate in this area and have been for over 50 years.
3. The Black Rock Desert High Rock Canyon National Conservation Area and Wilderness Areas make up 1.2 million acres that are open to a select few. The legislation did not add a buffer zone around the NCA. BLM should not have more restrictive recreational opportunities outside this area. In fact, BLM should allow for more recreational opportunities as it currently allows in Alternative A.
4. The Granite Range needs to be opened so the rest of the public that prefers other types of recreation can enjoy this area too, especially the elderly and disabled. Your Alternative D is too restrictive, especially the zone 1 areas. I would encourage limiting travel to current existing roads, ways and trails. But, I would NOT close existing roads, ways and trails or develop cherry stem roads.
5. Your cherry stem road in the south end of the Granite SRMA stops far short of the private land. The existing road clearly goes through the private property over to skull meadows and further into the range. The BLM proposed cherry stem cuts off a large part of the access route, a jeep trail, into this range. I've enclosed copies of the USGS 7.5 minute maps showing all the jeep trails in this area. These roads are not overgrown nor are they barely visible. They are well used, well defined and should remain open to motorized vehicles.
6. Management by closure is not an option.

I-Stammers-1: Action D-WSA 2.1 identifies seven areas of lands with wilderness characteristics that meet inventory requirements.

I-Stammers-2: Activities on private lands (such as the waste transfer station) have limited effect on management decisions applied to Federal land. Management decisions authorized by the RMP would have no effect on valid existing rights, including previously-issued geothermal leases. The No Surface Occupancy recommend in this area is related to maintaining the integrity of the Noble's Route, part of the California National Historic Trail system. See Action D-CR 6.8.

The protected areas are within one-mile of the trace of the Noble's Route, a component of the California National Historic Trail (CNHT). The CHNT is the subject of Objective CR6 and subsequent actions. Particularly relevant in this situation is Action CR 6.8.

I-Stammers-3: See response I-Stammers-2.

I-Stammers-4: Comment noted.

I-Stammers-5: OHV closures are not proposed in the Granite Range outside of Wilderness/WSAs and areas for seasonal closures during bighorn sheep lambing. A separate travel management plan would be developed.

I-Stammers

Comments

Responses

I-Stammers-6	<ol style="list-style-type: none"> The mountain naturally provides seasonal use due to the elevation and steepness. Snow and mud already limit access during the winter and spring months. I would not put signs up to encourage use either. Leave the area like it is. People will love it to death if you label it. How is BLM going to appropriately manage this SRMA if designated? It is a misconception that a designation will bring in more funds to manage an area. BLMs experience with the NCA should have told you that. BLM does not have the funds or the staff to currently manage the land they have now. Certainly they will not have the necessary funding to manage this area appropriately if it is designated.
I-Stammers-7	<p>Geothermal-Fluid Minerals: I prefer Alternative A.</p> <ol style="list-style-type: none"> All of your other Alternatives close geothermal leasing, not open up more land for leasing. What happened to fast tracking the renewable energy process that Secretary of Interior Salazar requested earlier this year? How can BLM prefer "closing" geothermal leasing and add "no surface occupancy" (NSO) stipulations on leased lands outside of Gerlach, but build an administrative site right on top of the existing geothermal lease they are trying to stop? What is the critical area outside of Gerlach that would require the land to be closed to geothermal or a NSO, but allow a BLM administrative building? Closing an area to geothermal, does not allow for diagonal drilling should there be important surface resources to protect. Having an area closed to geothermal development will require the existing lease holder to do an EIS for every aspect of their project. This is not making things easier or help to fast track renewable energy development. It is important to continue to allow for renewable energy development for currently leased lands and unleased lands, and to be consistent with the National Renewable Energy Policy. BLM should allow currently leased lands to have access for project development and infrastructure. BLM should not close or add no surface occupancy stipulation to this RMP.
I-Stammers-8	
I-Stammers-9	
I-Stammers-10	
I-Stammers-11	
I-Stammers-12	
I-Stammers-13	<p>Rights of Way: Allow for transmission and utility ROW around geothermal leased lands and lands open for renewable energy. This will allow for the infrastructure needed for renewable energy development.</p>
I-Stammers-14	<p>Visual Resource Management Areas:</p> <ol style="list-style-type: none"> What is the reason for a VRM Class II around the Gerlach Geothermal LLC leased lands on the southeast side of the Granite Mountains? The NCA does not require a buffer zone in this area, so the classification should be lowered to a Class III. The towns of Gerlach and Empire can be seen from this area. Also in view are the following: 2 gravel pits, grave yard, garbage transfer station, the DC transmission line, train tracks, junk yard, a new BLM administrative site, US Gypsum mine and State Route highways 447 and 34, plus vehicular traffic. With all of this, community infrastructure, a VRM class III is more appropriate. The area on the east side of the southern playa of the Black Rock Desert is a VRM class III. The west side should be too.
I-Stammers-15	
I-Stammers-16	
I-Stammers-17	
I-Stammers-18	

I-Stammers-6: Comment noted.

I-Stammers-7: "Fast-tracking" is done on a case-by-case basis and must be applied for by the proponent. Once requested it has to be reviewed and approved on a case-by-case basis taking into consideration other priorities.

I-Stammers-8: Existing leases are subject to the stipulations placed on the lease at the time of issue. A decision to place limitations on a particular area is effective only on future leases.

I-Stammers-9: The lands around Gerlach are within the protection area for the California National Historic Trail, and to the northwest is proposed as Priority 1 Wildlife Habitat.

I-Stammers-10: Our discussions with geothermal resource development companies has led us to conclude that diagonal drilling is of marginal benefit to them. The depth to most of their targets puts physical and mechanical constraints on their ability to substantially vary their target location from the vertical. In those situations where we determined that diagonal drilling might be beneficial we proposed No Surface Occupancy as opposed to outright closure.

I-Stammers-11: See response I-Stammers-8. The decision on what level of NEPA analysis is appropriate in any specific situation is dependent on the scope of the proposal, the resources impacted, and the anticipated degree of those impacts. These determinations are beyond the scope of the RMP.

I-Stammers-12: Fluid mineral leasing, when allowed, may be subject to stipulations designed to protect other resources present in the lease area. Alternatives A and B recommend the leasing scenario that is less restrictive, versus Alternatives C and D. BLM is required under FLPMA to manage public lands in a manner that protects resources values while providing multiple uses. (FLPMA Sec. 102(8) and Sec. 103(c)). Visual resource inventories conducted in 1982 and more recently in 2009. Refer to Figures 2-12 to 2-15.

(Cont on next page)

Responses

(Responses Continued)

I-Stammers-13: Energy Corridors are designated in the RMP. If new Corridors are needed to meet future demand the plan may be amended. Many Renewable Energy projects will not require designated corridors. These projects will be handled on a case by case basis with rights of way. Rights of Way are permitted in Avoidance Areas if there is no other alternative.

I-Stammers-14: Visual resource management areas are being proposed based on visual resource inventories conducted in 1982 and more recently in 2009. Based on historic and current inventory data, the southeast area of the Granites qualifies for VRM II management. Refer to Figures 2-12 to 2-15.

I-Stammers-15: VRM management classes are not buffer zones. There are no buffer zones adjacent to the NCA. Refer to Figures 2-12 to 2-15.

I-Stammers-16:

VRM management classifications II through IV do not preclude development. Alternatives B and D propose VRM class III for the towns of Gerlach and Empire. Refer to Figures 2-12 to 2-15 for a full range of Alternatives.

I-Stammers-17: See response #16.

I-Stammers-18: Visual resource management areas are being proposed based on visual resource inventories conducted in 1982 and more recently in 2009. Refer to Figures 2-12 to 2-15.

I-Stammers

Comments

Responses

I-Stammers-19: Comment noted.

I-Stammers-20: The NCA was created to protect segments of emigrant trails and other values within the NCA. However, there are emigrant trail segments and other resource values outside of NCA boundary that warrant protection. The NCA protects portions of the Applegate-Lassen Trail, the Nobles Route, and the John C. Fremont Route and their viewsheds within the NCA boundary. There are many other documented segments of these trails and routes, as well as the main California Trail and other historic routes and their viewsheds, outside of the NCA. While many trail segments are clearly visible, others are overgrown. Even when it is overgrown the route can be verified utilizing a variety of tools including historic maps and journals, and the presence of swales and trail era artifacts.

I-Stammers-21: The Applegate-Lassen Trail and the Nobles Trail are part of the California Emigrant Trail which has been designated as a National Historic Trail by Congress. Preservation of trail segments varies by environmental context. Amount and regularity of use can have an impact as well. While many historic trail segments are clearly visible, others are overgrown. Even when the route is overgrown it can be verified utilizing a variety of tools including historic maps and journals, and the presence of swales and trail era artifacts. VRM classification development was the result of a combination of the visual resources inventory and consideration of resource values, including the viewshed of historic trails. VRM management here is consistent with the Comprehensive Management and Use Plan/Final Environmental Impact Statement for the Oregon, California, Mormon Pioneer, and Pony Express National Historic Trails (USDI/NPS 1999) prepared by the National Park Service. Based on these factors, the BLM has developed a range of alternatives. See VRM Objective 2.

I-Stammers-22: Specific allotment AUM allocation decisions are addressed at the site specific or allotment level. See LG 1.3

I-Stammers-23 through I-Stammers-29 : Comments noted.

6. Your Alternatives B, C and D figures are correct for a VRM class III along highway 447 heading west towards Cedarville, CA on the south side of the Granite Mountain Range just outside of Gerlach.
7. There is a paved highway, railroad tracks and a DC Transmission line that goes through this area.
8. The reason for the NCA was to protect the emigrant trail. There is no reason to protect segments outside of the NCA especially if they can not be seen.
9. Before you have a more restrictive classification in this area, go out and verify the emigrant trail is visible.
10. How can BLM suggest that the roads and jeep trails up on the Granite Mountain which are used annually by vehicles and ATVs, are overgrown and barely visible, yet suggest that the trails made by emigrants in a covered wagon are still visible after 160 years?

Grazing: I prefer Alternative A. However, I did not see an alternative that increases AUMs. This seems to be a flaw in looking at all aspects of grazing. Help reduce fuel levels by continuing to allow grazing.

Wild Horse and Burros:

1. Manage the Wild Horses and Burros with the option that gives you as many tools as possible to maintain population management levels below the minimum amount.
2. Continue to remove wild horses and burros when they enter private property and from the range land when their numbers increase.
3. Most people like to see the wild horses and burros out on the range. However, it is extremely important to make sure their population is kept at a manageable level.
4. The resource needs to be protected and managed for all wildlife, not just one species.
5. It is well documented that the wild horses dominate the springs and keep other wildlife from getting to water in times of drought.

Noxious Weeds:

1. BLM should continue to support Cooperative Weed Management Areas and Weed Districts.
2. The BLM should have a tool box with as many options as possible to help manage these invaders.

Thank you again for the opportunity to comment.


Donna Stammers

Cc: DOI Secretary Ken Salazar
BLM Director Bob Abbey
BLM State Director Ron Wenker
Senator Harry Reid
Senator John Ensign
Congressman Dean Heller

I-Stripe

Comments

Responses

September 29, 2010

Bureau of Land Management
Winnemucca Field Office
5100 E Winnemucca Blvd.
Winnemucca, NV 89445

Attention: Michael Truden

Dear Mr. Truden:

I am writing this letter with regards to the Marvel and Bell permits around the Humboldt River Ranch development. I'm writing as a private citizen. What I am concerned with is the impact to the economy. People believe it is only one or two ranchers, but if you examine how much these two contribute to the economy you will see they buy hay from other ranchers, equipment from dealers, which keep people employed. They buy feed, and then there is the cow buyer, then the trucker, the feed lot operators, the slaughter plans, the meat market, the grocery store. So if you examine these two ranchers do contribute a lot to the economy.

The mentality of many people is "I don't care about the rancher, farmer, dairy farmer, and row crop farmers, because I go down to Safeway and get my food". The sad part of this is that they believe it. I guess they think food and other goods just miraculously appear on the shelves.

The other comment that I would like to make is, if you take these cattle out of the area, you increase the fire danger. People don't seem to understand this.

I realize my comments don't mean much but I am sure there are a lot of folks who would have the same opinion. Please review all the facts and make the decision which is best for all concerned. Thank you.

Sincerely,

Don Stripe
PO Box 940
Winnemucca, NV 89446
striperanch@wmca.net



RECEIVED BLM
WINNEMUCCA NV
2010 SEP 30 PM 1:14

I-Stripe-1

I-Stripe-1:

BLM developed a reasonable range of alternatives that considered areas closed to livestock grazing. Action D-LG 1.3 does not close portions of Humboldt House and East Rye Patch allotments. The social and economic section has been updated in the PRMP.

Comments

Responses



10/25/2010 12:19 PM

To: wdrrmp@blm.gov
cc:
bcc:
Subject: Winnemucca RMP

October 25, 2010

Winnemucca RMP
c/o Bob Edwards
Bureau of Land Management
Winnemucca District Office
5100 E. Winnemucca Blvd.
Winnemucca, NV 89445

Comment category: Wild horses and burros

Dear Mr. Edwards:

I-T-1

I am writing to urge you to adopt a Resource Management Plan that protects wild horse and burro populations in Nevada's Winnemucca District. Unfortunately, none of the alternatives described in the proposed Winnemucca RMP adequately protect and preserve wild horses and burros.

The policies presented in the proposed RMP do not change the BLM's reliance on mass wild horse roundups and removals to restrict wild horse populations and allow more federally subsidized cattle grazing on public lands. These policies have resulted in the stockpiling of approximately 40,000 wild horses in government holding facilities--more than are left free on the range.

A responsible policy must include:

I-T-2

- Eliminating livestock grazing within designated wild horse and burro areas;

I-T-3

- Minimizing or eliminating harmful activities within wild horse and burro areas, including gas and oil exploration, mining and recreational vehicle activity;

I-T-4

- Fairly allocating forage and water resources for wild horses and burros within designated herd management areas;

I-T-5

- Increasing appropriate management levels for wild horses and burros based on scientific data;

I-T-6

- Enhancing range conditions, including restoration and improvement of water sources for wild horses and other wildlife species;

I-T-7

- Protecting predators in an effort to restore natural population control mechanisms;

I-T-1: Comment noted.

I-T-2: There are no designated wild horse and burros areas. HMAs are areas where burros and wild horses were found in 1971 that the BLM manages for horses but not exclusively. Alternative C-LG 1—option 2 proposes elimination of livestock grazing throughout the Winnemucca District.

I-T-3: The Taylor Grazing Act authorizes the use of rangelands to livestock grazing, the Wild Horse & Burro Act established HMAs and provided protection for WH&B. The Federal Land Management and Policy Act (FLPMA) mandates that the BLM administered land be managed for multiple uses. Livestock grazing and WH&B are both uses authorized to occur on BLM administered land. The RMP analyzes several proposed levels of livestock grazing, up to and including elimination of livestock grazing. The BLM has revisited the WH&B management actions and environmental analysis in the FEIS/RMP.

I-T-4: The amount of forage available to allocate to WH&B shall be determined through in-depth evaluation of resource monitoring data and following a site-specific environmental analysis decision process. Forage for WH&B (AUMs) is allocated based on the AML upper limit.

I-T-5: Specific allotment AUM allocation decisions are addressed at the site specific or allotment level.

I-T-6: This is achieved by maintaining herds at AML and through properly managed livestock grazing.

I-T-7: Management of big game species and populations are under the jurisdiction of the Nevada Department of Wildlife (NDOW) and is outside the scope of this analysis. See section 1.6 Planning Criteria and Legislative Constraints #3. The BLM works in cooperation with NDOW in the management of big game habitat. Under a multiple-use mandate, the BLM strives to achieve a balanced management of public land resources.

Comments

Responses

I-T-8

- Utilizing PZP fertility control, where necessary, to control wild horse reproduction; and

I-T-9

- Supporting public/private partnerships for the creation of wild horse preserves to manage horses on the range without mass removals.

I-T-10

Roundups of wild horses and burros should only be conducted in verifiable emergencies. Any roundups should be conducted with respect for the social integrity of wild horse herds keeping family bands intact during relocation. The "zeroing out" of Herd Management Areas (removing all horses and permanently closing the land to wild horses) should be prohibited.

For all of the above stated reasons, I respectfully submit this comment and urge the BLM to adopt a responsible RMP for the Winnemucca District that protects and preserves America's wild horse and burro populations. ;

Name: [REDACTED]

Address: [REDACTED]

Status: Private citizen

Confidentiality: Please withhold my name and address.

I-T-8: Action WHB 1.7 – Alternatives A,B, and D Allows use of birth control methods for WH&B including PZP.

I-T-9: Comment noted.

I-T-10: Habitat for WH&B is composed of four essential components: forage, water, cover, and space. These components must be present within the HMA in sufficient amounts to sustain healthy WH&B populations and healthy rangelands over the long term. If they are not present in sufficient amounts, the authorized officer should consider amending or revising the LUP to remove the area's designation as an HMA. If the decision is made to return a designated HMA to HA status, the total population of WH&B should then be gathered and removed. See BLM Manual Section 4710.3.

I-Teixeira

Comments

Responses

----- Forwarded by Lisa Ross/WFO/NV/BLM/DOI on 07/19/2010 11:40 AM -----
Margaret Teixeira <margaretteixeira@yahoo.com>

07/16/2010 09:59 AM

To: wfoweb@nv.blm.gov
Cc:
Subject: Winnemucca RMP, Edwards

I am deeply concerned about the cattle in Rye Patch. First of all I was very much aware of fencing the cattle out of my property when I purchased my property. I do have a fence all around my property but what I'm really concerned about is the safety of all those who live here. I did have an accident several years ago and my vehicle had \$3500.00 worth of damage in which I was responsible for, not the rancher. I was just driving to the Truck Stop on Rye Patch Reservoir Rd. and of course it was dark and I came upon a herd of cattle in the middle of the road. I was just driving at 25 miles per hour. Well I stopped to let the herd cross the street but a baby cow ran after it's mom and hit my car. He then stood up and walked away. I'm very grateful for the cow being okay and also myself but my car had a great amount of damage. What would have happened had I been driving any faster. This is very dangerous. There have also been another accident here on that same road, same location that totalled a big diesel truck. The driver hit and killed a big cow and also received injuries himself. What will happen when someone gets killed. I love animals and I think they are beautiful but they should not be roaming around in a residential area. Why isn't safety for humans a concern here. The open range laws are great but when people start moving in, these laws need to be changed for the safety of a human life. Please consider my concerns! The rancher is irresponsible for caring for these animals. The cattle are seen at the gas pumps at the truck stop. People coming off the freeway to get gas - very dangerous. Several cows have gotten hurt and even died on the properties and the rancher has left them there close to residences for weeks before he came to check them. The smell of a dead carcass is very offensive as you well know and is a major health issue. At one time a resident filled up a swimming pool for the cows to drink water, some have even assisted in helping the mother cow give birth. This is another negative mark for the rancher. Our growing Community, by no means is an anti-animal Community. Nevada is a vast beautiful State and there are so many areas where the rancher can place his cattle, why here!!!! There are no cows in Reno nor Lovelock roaming the streets. Progress is always in motion and changes need to be made especially for the safety of the human life and the animals.

Respectfully Yours,

Margaret Teixeira

I-Teixeira-1:

Alternative D-LG 1.3 considers closure of livestock grazing within areas near the Humboldt River Ranch.

I-Teixeira-1

I-Trout

Comments

Responses



Archaelow@sol.com

10/25/2010 08:16 PM

To: WDRMP@BLM.Gov

cc: Robert_Edwards@NV.BLM.Gov,
Zwaantje_Rorex@nv.blm.gov,
Peggy_McGuckian@nv.blm.gov

bcc:

Subject: Comments on Draft RMP

Dear Mr. Edwards,

Several items do not appear to have been adequately addressed under Alternative D in the document.

1. The Fort McDermitt Paiute-Shoshone Reservation Cemetery currently straddles reservation and BLM administered lands. Additionally, tribal elders have reported grave sites south of the existing cemetery boundary. All grave sites need to be transferred to reservation control. Therefore, **the southern boundary of the lands identified for possible transfer on pages 2-238, 2-239, 2-240, and 2-241 of Table 2-3 (Alternatives C and D) should be extended one mile south or the currently described southern boundary or to such shorter extension as may be developed in consultation with the Tribal Council.**

2. The RMP does not reference the unintentionally built, 14 self-help residences constructed on BLM land adjacent to the Fort McDermitt Paiute-Shoshone Reservation in the early 1970s. In the 1970s and again in the early 1990s, BLM Executive Management directed the Winnemucca BLM District to facilitate resolution of the 14 trespasses through a legislative process. My understanding is that the RMP is intended to provide a basis for NEPA compliance should legislation transferring BLM administered land to the Tribe be introduced and approved by Congress. **The RMP should be cross-referenced with the 14 trespass locations to ensure that the legal descriptions on pages 2-238, 2-239, 2-240, and 2-241 of Table 2-3 (Alternatives C and D) cover all 14 sites. This may require consultation with Tribal Officials since BLM and BIA records may not identify all of the locations.**

3. Alternative D appears to designate land east, west and north of the existing Humboldt County Landfill as a retention zone. Given the County's requests for R&PP transfer of all land in the entire section north of the landfill and portions of the section east of the existing landfill, **the southern boundary of the proposed retention zone should be moved at least one mile north of the existing Humboldt County landfill to permit the R&PP sale process to continue.**

4. Although Alternative D does provide for the possible sale of more than 1,000,000 acres, **care should be taken to ensure that:**

A. lands north of Gerlach (not included in the Black Rock NCA RMP) adjacent to existing ranches and farms are included in the lands designated for possible sale; and

B. lands north and south of Orovada adjoining existing farms and ranches are included in the lands designated for possible sale.

Respectfully submitted,

Lewis W. Trout

I-Trout-1: We have identified the cemetery until a specific additional area is identified, we are unable to include that area in the alternatives.

I-Trout-2: We have identified these lands suitable for disposal that would address trespass issues in the event Congress approves transfer. The proposed land transfer would address all trespasses. See action C and D LR

I-Trout-3: The entire section north of the Humboldt County Landfill is designated as suitable for disposal. Land disposal around the Town of Gerlach was coordinated with Washoe County. Lands meeting the criteria around Orovada have been designated as suitable for possible disposal.

I-Trout-4: Lands in these areas are included in the lands suitable for possible disposal. Those lands shown as lands to be retained have known resource values that preclude any possible disposal.

I-Van Slyke

Comments

Responses

Winnemucca, NV 89445-2921

Dear Mr. Edwards,

In 1986, my husband and I adopted our first mustang, Starbuck. Two years later, we adopted a second mustang . Shiloh . and a burro . Pepe. Starbuck and Pepe are still with us. Our experience with the adoption was a great success, and we were grateful to have the opportunity to save them from either life in a holding facility or destruction.

That being said, we would have preferred to see our horses and burro live out their natural lives in the wild lands to which they were born. Starbuck was caught in Oregon, Pepe in Arizona, and our beautiful Shiloh in Nevada.

With this letter I urgently ask you to please adopt a responsible Resource Management Plan to protect wild horse and burro populations in Nevada's Winnemucca District. The proposed Winnemucca RMP fails to adequately protect and preserve wild horses and burros. The proposal will lead to *more* roundups and removals; *it simply perpetuates a failed policy which has resulted in more horses languishing in government holding pens than are free on the range* .

A responsible policy will:

– Designate areas for wild horse and burro grazing ONLY; no wonder resources are stressed with thousands of heads of cattle and sheep grazing on public lands.

– Eliminate activities such as four-wheelers, motorcycles and other disruptive recreational vehicles that disturb and distress herds. Minimize gas and oil exploration and mining.

– Prioritize forage and water resources for wild horses and burros within designated herd management areas.

– Base wild horse and burro management levels on scientific data.

– Restore and improve water sources for wild horses and other wildlife species; enhance range conditions to benefit the herd and all wildlife populations.

– Protect predator populations to help naturally balance predator/prey numbers.

I-VanSlyke-1: Comment noted.

I-VanSlyke-2: The Taylor Grazing Act authorized the use of rangelands to livestock grazing, the Wild Horse & Burro Act established HMAs and provided protection for WH&B. The Federal Land Management and Policy Act (FLPMA) mandates that the BLM administered land be managed for multiple uses. Livestock grazing and WH&B are both uses authorized to occur on BLM administered land. The RMP analyzes several proposed levels of livestock grazing, up to and including elimination of livestock grazing.

I-VanSlyke-3:
A Comprehensive Transportation & Travel Management Plan (CTTMP) will address these concerns after the Record of Decision for the RMP is signed. The CTTMP will be determined with full public participation and and input.

I-VanSlyke-4: Comment noted.

I-VanSlyke-5: Comment noted.

I-VanSlyke-6: Comment noted.

I-VanSlyke-7: Management of big game species and populations are under the jurisdiction of the Nevada Department of Wildlife (NDOW) and is outside the scope of this analysis. See section 1.6 Planning Criteria and Legislative Constraints #3. The BLM works in cooperation with NDOW in the management of big game habitat. Under a multiple-use mandate, the BLM strives to achieve a balanced management of public land resources. Action WHB 1.7 – Alternatives A,B, and D Allows use of birth control methods for WH&B including PZP.

I-Van Slyke

Comments**Responses**I-Van Slyke-7
Cont-d.

↑ - If necessary, use PZP fertility control.

I-Van Slyke-8

- With the help and support for public/private partnerships, create wild horse preserves to manage horses on the range without mass removals.

I-Van Slyke-8:
Comment noted.

I-Van Slyke-9

Roundups should only be conducted in verifiable emergency situations. If necessary, roundups must be conducted humanely, respecting the social integrity of wild horse herds, keeping family bands intact during relocation. "Zeroing out" Herd Management Areas removing all horses and permanently closing the land to wild horses -- is simply not right and should be prohibited. Using helicopters and motorized vehicles to panic and stampede the animals is poor management. It simply leads to injuries, maiming and often, death.

I-Van Slyke-9:
Comment noted.

I urge the BLM to adopt a responsible RMP for the Winnemucca District; as Americans, we are ALL stewards of these lands and these grand animals. They deserve a policy that protects and preserves their heritage.

Sincerely,

cc: Congressman Jerry Moran

Senator Pat Roberts

Senator Sam Brownback

President Barack Obama

Secretary of the Interior Ken Salazar

Patti Van Slyke
(785) 267-4868

I-Vanderstad

Comments

Responses

"Maureen VanDerStad" <mo@besobold.com>

10/24/2010 09:15 AM

To: <robert_edwards@blm.gov>

Cc:

Subject: Winnemuoca RMP, Edwards Public Comment

I am in favor of managing public lands for multiple use but that multiple use must include wild horses and burros having their fair share of resources which they are not getting now.

I-Vanderstad-1:
Comment noted.

An HMA is an HMA and should be managed as such and should be managed for the herds that specific land was "allocated" to. Should horses leave the HMA's in search of resources since their resources have been given away to other interests, a very unjust and inequitable scenario is set up. Cattle ranching or private grazing within HMA's is not a good practice, it is a privilege not a right and decreased grazing pursuant to 43 C.F.R 4710.5 (a) should be carried out.

Invest resources into being able to conduct proper EA's that truly create range health and not continue a failed program of so called public lands management. The degradation on public lands is not due to horses but to poor planning for allocation of resources and poor choices. If the land cannot support existing multiple use than do not increase mining expansion projects and the like.

I-Vanderstad:-2:
Comment noted.

In my opinion, the BLM has a not so very sneaky way of "managing" wild horses and burros resources in such a way that they are being driven out and situations to allow for their removal are created to accomplish what amounts to theft of their "allocated" resources. Wild horses and burros are entitled to be considered fairly in the multiple use and resource management on public lands.

I feel that the RMP as it stands as a draft plan amounts to nothing more than a clear and deliberate attempt by BLM to defraud the American people and to rob them of national treasures – the wild horses and burros and a healthy environment. Your system of management as it stands now and has been done is a not so cleverly designed ruse to serve only private interests and not the interests of the land or the public who the BLM stewards the land and resources in trust for.

Sincerely,
Maureen VanDerStad

I-Weymouth

Comments

Responses



comments@wdo.mmp
09/04/2010 05:12 PM

To wdrmp@blm.gov
cc
bcc
Subject Comments on RMP

```
TodaysDate = (0: '9-3-2010')
FirstName = (0: 'Weymouth')
LastName = (0: 'Kamakana')
Address = (0: 'P.O. Box 145')
City = (0: 'Kaunakakai')
ZipCode = (0: '96748')
State = (0: 'HI')
Telephone = (0: '')
email = (0: '')
MailingList = (0: 'No')
CommentCategory = (0: 'Livestock Grazing')
Comment = (0: 'I was contacted that there are issues with cattle grazing on
the Humboldt properties. It is my opinion that we owners should not have to
deal with cattle grazing, breaking up roads, fences, and property. Please
register my complaint . I do not want to pay higher assessments to repair any
damage caused by cattle, nor leaving around the area feces that can cause
diseases and flies.

Thank you.')
```

I-Weymouth-1

I-Weymouth-1:
Comment noted.

I-Wicart



shahars2000@comcast.net

10/17/2010 11:03 AM

Comments

To wdrrmp@blm.gov

cc

bcc

Subject WWinnemucca DDistrict RMP CComments

Responses

Dear Sirs,

I want to have your Agency to immediately stop all round ups planned. We the People of the United States of America are tired of your attempts to wipe out the herds of wild mustangs and burros for your self serving purpose. We know what that is. Your facts and figures are totally outdated which can be proven by independent studies which were conducted by qualified agents. You are not treating the corralled horses the way horses should be taken care of. No shelter, no worming, wrong feed. A private citizen would be arrested for what you are neglecting to do. You are WASTING our tax dollars by the millions. Rounded up horses are disappearing. Fallon supposedly has no horses presently but there are 2000 in the facility. Everything you are doing is being documented. You have lawsuits pending yet you continue to act illegally I might mention with the round ups. You have a convicted felon flying helicopters. Your agency is out of control.

The media is even covering your activities overseas. It is time to quit. We are not going away. Just getting stronger by the day. I want my letter published. I will find out if you do not.

Thank you,
Gudrun Wicart

I-Wicart-1

I-Wicart-1: BLM is required to manage WH&Bs based on the WH&B Act.

I-Wilson

Comments

Responses



Joshua Wilson
joshua_wilson@sbcglobal.net
 To

09/24/2010 04:35 PM

To: wdmp@blm.gov
 CC: robert_edwards@blm.gov
 BCC:
 Subject: Winnemucca RMP, Edwards

Good afternoon Bob,

Please consider the following comments regarding the Winnemucca RMP on behalf of myself, as well as the Trailblazers Motorcycle club. I would like to personally thank you for the opportunity to participate in this process. Below I will list a couple of items for your consideration.

I-Wilson, J.
 -1

Action D-R 8.1.1

I would ask that you reconsider the boundaries identified in Zone 2 RMZ to remove any area that has roads or trails contained within it. In looking at the current boundary of this zone, it seems to include areas that have existing roads and trails that ohv users would no longer be able to utilize. I don't feel this area fits the description of "wilderness" and there are great ohv opportunities contained within this zone. I would be willing to volunteer my time to identify the roads and trails contained within this zone if you would be inclined.

I-Wilson, J.
 -2

Action D-R 9.1 through Action D-R 9.1.3.1.2.

I would ask that you reconsider the recommended alternative and replace these sections with alternative B Actions B-R 9.1. thru B-R 9.1.3.1.2. I can certainly understand the concept in alternative D, however I feel with proper management and resources we can reach common goals without setting specific limits by area or type of event.

Thank you for your consideration and I look forward to working with you.

Josh Wilson
 1761 Kinglet Drive
 Sparks, NV 89441
 775 424-2133
joshua_wilson@sbcglobal.net

I-Wilson, J.-1:

A separate implementation/activity plan would be developed for RMZs which would include NEPA analysis and public involvement.

I-Wilson, J.-2:

This will be further addressed & brought forward in the subsequent Transportation & Travel Management Planning processes.

I-Wilson

Comments

Responses



"Sharon Willson, PMP"
<soosleharon@gmail.com>
10/23/2010 07:07 AM

To: wdrrmp@blm.gov
cc:
bcc:
Subject: Winnemucca RMP, Edwards

To whom it may concern

I-Wilson, S.-1 I am very concerned that none of the alternatives considered in the RMP adequately address the need to protect and preserve wild horses and burros.

I-Wilson, S.-2 Alternative C Option 2 appears to be the best of the alternatives discussed. However, without sufficient language to protect our heritage of wild horses, it doesn't go far enough.

Alternative D, even though it is the BLM-recommended alternative, perpetuates the myth that government is able to protect interests of all. In it is says that it is a "balanced approach to public lands management with an appropriate level of flexibility to meet the overall needs of resources and use allocations". I have seen over and over again, that there is no such thing as a balanced approach from the BLM. Instead, economics win out over people's (and the environment's) interests every time. That is unacceptable.

I have watched the BLM systematically rely on mass wild horse roundups and removals so that more federally subsidized cattle grazing and mineral extractions and exploration can occur, to the economic benefit of the government and the companies involved, but to no one else. The policies that permitted this have resulted in tens of thousands of wild horses in government holding facilities, costing the taxpayers millions of dollars a year.

I-Wilson, S.-3 In order to create a responsible RMP, you must address the following:
4 ● Eliminating livestock grazing within designated wild horse and burro areas;
5 ● Minimize or eliminate mineral exploration, extraction and recreational vehicle activities
6 ● Allocate forage and water resources for wild horses and burros.
7 ● Enhance range conditions including restoration and improvement of water sources for wild horses and other wildlife species;
8 ● Increasing appropriate management levels for wild horses and burros based on verifiable, transparently-provided scientific data;
● Support public/private partnerships for the creation of wild horse preserves to manage horses on the range without mass removals.

I-Wilson, S.-9 Roundups of wild horses and burros should only be conducted in verifiable emergency situations. If necessary, roundups must be conducted with respect for the social integrity of wild horse herds keeping family bands intact during relocation. The "zeroing out" of Herd Management Areas (removing all horses and permanently closing the land to wild horses) should be prohibited.

Respectfully submitted,
Sharon Willson

I-Wilson, S.-1 and 2: Comments noted.

I-Wilson, S.-3: Comment noted.

I-Wilson, S.-4: The Taylor Grazing Act authorizes the use of rangelands to livestock grazing, the Wild Horse & Burro Act established HMAs and provided protection for WH&B. The Federal Land Management and Policy Act (FLPMA) mandates that the BLM administered land be managed for multiple uses. Livestock grazing and WH&B are both uses authorized to occur on BLM administered land. The RMP analyzes several proposed levels of livestock management, up to and including elimination of livestock grazing.

I-Wilson, S.-5: LG 1.3, option 2 analyzed no livestock grazing throughout the District.

I-Wilson, S.-6: This is achieved by maintaining herds at AML and through properly managed livestock grazing.

I-Wilson, S.-7: Specific allotment AUM allocation decisions are addressed at the site specific or allotment level.

I-Wilson, S.-8: Comment noted.

I-Wilson, S.-9: Comment noted.

	Comments	Responses
I-Wong	<p>My name is Scholastica Wong, owner of one of the properties in Humboldt River Ranch.</p> <p>I am hoping to make the Humboldt River Ranch a cattle free zone. Please address my comments in support of the HRRRA regarding the following issues.</p> <ol style="list-style-type: none">1. Safety – No street lights causing poor visibility of cattle roaming on the roads. May cause severe accidents.2. Damage to roads and v-ditches – cows get water from v-ditches causing damage.3. They create additional expense to members – assessments to be increased.4. Cost of surveying to put up fence is an extraordinary expense - locating pins on our property vs. BLM property.5. EIS (Environment Impact Study) statement is very expensive.6. If members don't have a fence on their property the cows can damage their yards and homes.	<p>I-Wong-1: The PRMP does not close areas near Humboldt River Ranch to grazing – See Action #-LG 1.3</p>


I-Wong-1

The New Busy is not the old busy. Search, chat and e-mail from your inbox. [Get started.](#)

I-Yates

Comments

Responses

 Bureau of Land Management Winnemucca District RMP/EIS

For the BLM to formally consider your comments regarding the Draft Resource Management Plan / Environmental Impact Statement (Draft RMP/EIS), written comments are required. To assure consideration you should provide your comments by **September 25, 2010**. Please fax this completed form to (775) 623-1503 or mail it to the following address:

Winnemucca District RMP Comments
c/o Bob Edwards
Bureau of Land Management
Winnemucca District Office
5100 E. Winnemucca Blvd.
Winnemucca, NV 89445

RECEIVED BLM
WINNEMUCCA NV
10 SEP 14 PM 12:39

You may e-mail comments to wdrmp@blm.gov or complete an online comment form at http://www.blm.gov/nr/st/en/foi/foia/blm_information/rmp.html. In order to continue receiving information and future mailings about the Winnemucca District RMP, you must ask to be added to the official RMP mailing list by submitting this form by September 25, 2010.

* Denotes required fields.

Your Name* Pamela Yates Today's Date* 9-08-2010

Please indicate your affiliation by checking one of the following boxes:

☒ Private Individual (no affiliation)

Confidentiality Request:

Please indicate if you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act. This request does not preclude the need to complete the required information below.

A request for confidentiality will be honored to the extent allowed by law. Anonymity is not allowable for submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses.

No selection indicates you do not wish to withhold your information.

☐ Please withhold my name only. ☒ Please withhold my address only.
☐ Please withhold my name and address.

☐ Private Industry ☐ Citizen's Group
☐ Elected Representative ☐ Federal, state, tribal, or local government
☐ Regulatory Agency

Mailing Address* [REDACTED]

City* [REDACTED] State* [REDACTED] Zip Code* [REDACTED]

Telephone (optional) [REDACTED] E-mail Address (optional) [REDACTED]

Would you like to be added to or remain on the WDO RMP/EIS mailing list to receive future project-related information?

☒ Yes ☐ No

I-Yates

Comments

Responses

Please mark the appropriate category and write your comments in the space provided below. Feel free to attach additional pages if necessary.

- | | |
|--|--|
| <input type="checkbox"/> Access/Transportation | <input type="checkbox"/> Recreation/OMV (Hunting, Fishing, Hiking, Biking, etc.) |
| <input type="checkbox"/> Energy (Wind, Geothermal, Solar, etc.) | <input type="checkbox"/> Social/Economic Concerns |
| <input type="checkbox"/> Fire Management | <input type="checkbox"/> Vegetation/Noxious Weeds |
| <input type="checkbox"/> Historic, Cultural & Paleontologic Resources / Traditional Values | <input type="checkbox"/> Wild Horses & Burros |
| <input type="checkbox"/> Land Tenure (Retention/Acquisition/Disposal) | <input type="checkbox"/> Wilderness, Wilderness Study Areas & Other Special Designations |
| <input checked="" type="checkbox"/> Livestock Grazing | <input type="checkbox"/> Wildlife/Sensitive Species |
| <input type="checkbox"/> Minerals (Hardrock, Oil & Gas) | <input type="checkbox"/> Other Concerns (please define) |
| <input type="checkbox"/> Planning/RMP Process | |
| <input type="checkbox"/> Soil / Water / Air / Visual Resources | |

I am a lot owner at the Humboldt River Ranch on Button Lake Trail Lot 202 Phase D. I believe we need to live with nature and work together for a healthy balance. Cattle grazing is a man made business and we need to control the damage that cattle does to roads and personal property. I pay dues for the right to have good roads to drive on to my property. If the cattle ranchers are willing to pay for the damage there cattle does, oppose to feeding them that is fine. Until that happens I have a right to keep the cattle out, even if it means fencing off our area. We already have mining disrupting the area and have to hear trucks, have dust etc, we can control at least the further little bit of peace most people whom have and will retire there deserve. Thank You Pamela Yates

I-Yates-1:
Comment noted.

I-Yates-1

Public comments submitted for this planning review, including names and street addresses of respondents, will be available for public review at the Winnemucca District Office, 5100 E. Winnemucca Blvd, Winnemucca, NV 89415, during regular business hours (8:00 AM to 4:00 PM), Monday through Friday, except federal holidays. Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently on your written comments. Such requests will be honored to the extent allowed by law. Comments are not eligible for redaction from consideration in decisions and are not eligible for removal from the public record.